

FY 2019 Homeland Security Grant Program

Michigan Supplemental Guidance



This page intentionally left blank

Table of Contents

Preface	1
Program Purpose	2
Description of Programs	2
Alignment of HSGP to the National Preparedness System	4
Homeland Security Grant Program Priorities and Requirements	5
FY 2019 HSGP Funding Guidelines	10
FY 2019 HSGP – SHSP Investments	19
Appendix A: Summary of the National Preparedness Goal	27
Appendix B: Summary of the Core Capabilities	29
Appendix C: Stakeholder Preparedness Review Functional Gaps	32
Appendix D: FY 2019 Programs - Allowable Program Activities	39
Appendix E: Subrecipient Administrative Process	42
Appendix F: FY 2019 HSGP Project Workbook Checklist	43
Appendix G: FY 2019 Homeland Security Grant Program Document Submission Checklist.....	46
Appendix H: Audit Topics from 2 CFR 200	48
Appendix I: Noncompetitive Procurement for HSGP Subrecipients	57
Appendix J: Advance Request Procedures	58
Appendix K: Acronym List.....	60
Appendix L: MSP/EMHSD Points of Contact (POC)	61

Preface

The Fiscal Year (FY) 2019 Homeland Security Grant Program (HSGP) funding priorities are supported in this guidance as is Michigan's commitment to correct identified capability shortfalls. The Michigan State Police, Emergency Management and Homeland Security Division (MSP/EMHSD) is dedicated to assisting regional partner's implementation of the National Preparedness System (NPS) through the development and sustainment of core capabilities identified in the National Preparedness Goal (NPG). Allowable costs support efforts to build and sustain core capabilities across the prevention, protection, mitigation, response, and recovery mission areas. HSGP-funded activities must support the NPG (see Appendix A, Summary of National Preparedness Goal) and align to the FY 2019 Federal HSGP guidance and Michigan's FY 2019 HSGP Investment Justifications.

The investment descriptions included in this guidance document are the FY 2019 State Homeland Security Program (SHSP) investments submitted to the Department of Homeland Security (DHS) / Federal Emergency Management Agency (FEMA), Grants Program Directorate (GPD). The FY 2019 Urban Areas Security Initiative (UASI) Investment Justification is available to the UASI Region in a separate document. However, the HSGP guidance contained herein is applicable to the SHSP and UASI programs.

Michigan's FY 2019 SHSP and UASI investments are based on data derived from capability assessments resulting from the Threat and Hazard Identification and Risk Assessment (THIRA) and Stakeholder Preparedness Review (SPR) process. Capability-based investment planning allows regional homeland security partners to target funding to priority areas of the greatest concern for each region.

MSP/EMHSD will provide continued support to regional partners with implementation of statewide homeland security initiatives and the NPS throughout the FY 2019 period of performance.

Please note: This guidance is intended to provide supplemental information regarding administration of the HSGP and is not a complete resource for all potential HSGP funding scenarios or reporting requirements.

Program Purpose

The purpose of the FY 2019 HSGP is to provide funding to state, local, tribal, and territorial (SLTT) governments to prevent, protect against, mitigate, respond to, and recover from potential terrorist attacks and other hazards. The HSGP plays an important role in the implementation of the National Preparedness System (NPS) by supporting the building, sustainment, and delivery of core capabilities essential to achieving the National Preparedness Goal (NPG) of a secure and resilient nation. Delivering core capabilities requires the combined effort of the whole community, rather than the exclusive effort of any single organization or level of government. Among the five basic homeland security missions noted in the DHS Quadrennial Homeland Security Review, HSGP supports NPG to Strengthen National Preparedness and Resilience

The FY 2019 HSGP is comprised of three grant programs:

- 1.State Homeland Security Program (SHSP);
- 2.Urban Areas Security Initiative (UASI); and
- 3.Operation Stonegarden (OPSG)

Together, these grant programs fund a range of activities including; planning, organization, equipment purchases, training, exercises, and management and administration across all core capabilities and mission areas.

Please note: This guidance document does not address OPSG. Refer to the Federal FY 2019 HSGP Notice of Funding Opportunity and FY 2019 Operation Stonegarden Michigan Supplemental Guidance for information relating to OPSG.

Description of Programs

The HSGP includes a suite of risk-based grants to assist SLTT efforts in preventing, preparing for, protecting against, responding to, and recovering from acts of terrorism. FEMA's comprehensive suite of grant programs are an important part of the Administration's larger, coordinated effort to strengthen homeland security preparedness. HSGP is one tool among a comprehensive set of initiatives to help strengthen the Nation against risks associated with potential terrorist attacks. The grants under HSGP include:

State Homeland Security Program (SHSP)

SHSP provides funds to support the implementation of the National Preparedness System (NPS) to address planning, organization, equipment, training, and exercise needs to prevent, prepare for, protect against, respond to, and recover from acts of terrorism. SHSP also provides funding to implement initiatives based on capability targets and gaps identified during the Threat and Hazard Identification and Risk Assessment (THIRA) process and assessed in the Stakeholder Preparedness Review (SPR).

Use of SHSP funds must be consistent with and directly support implementation of the State Homeland Security Strategy, Regional Homeland Security Strategies, and one of the State's approved FY 2019 SHSP Investments (see FY 2019 HSGP - SHSP Investments section of this document for additional information). Linkages between specific projects undertaken with SHSP funds and specified documents will be highlighted and monitored through required

reporting mechanisms. Moreover, all allocations under the SHSP must support development, sustainment, and delivery of core capabilities to achieve desired outcomes identified in the NPG which can be found at <https://www.fema.gov/national-preparedness-goal>.

Note: Use of SHSP funds must be consistent with and directly support implementation of the State Homeland Security Strategy, Regional Homeland Security Strategies, and one of the State's approved FY 2019 SHSP Investments (see FY 2019 HSGP - SHSP Investments section of this document for additional information). Linkages between specific projects undertaken with SHSP funds and specified documents will be highlighted and monitored through required reporting mechanisms. Moreover, all allocations under the SHSP must support development, sustainment, and delivery of core capabilities to achieve desired outcomes identified in the NPG.

Urban Area Security Initiative (UASI)

UASI provides funds to address the unique planning, organization, equipment, training, and exercise needs of high-threat, high-density urban areas, and assists them in building an enhanced and sustainable capacity to prevent, prepare for, protect against, respond to, and recover from acts of terrorism. UASI funding can benefit preparedness for other catastrophic events, including natural disasters, if such use of the funds has the primary nexus be for terrorism preparedness, and is consistent with 6 U.S.C. § 609.

Note: The use and allocation of all grant funds available through the UASI Program must focus on the investments identified in the Urban Area's FY 2019 Investment Justification. The use of funds must also be consistent with overall UASI Program guidelines, the National Preparedness System, and must develop or sustain one or more core capabilities in the NPG. Funds used to support whole community and individual preparedness related efforts, such as engaging non-governmental organizations demonstrating the integration of children and individuals with disabilities or access and functional needs, in all phases of emergency management, the participation of disaster volunteers, such as Community Emergency Response Teams (CERTs) in training, exercises, and response and recovery operations, and educating the public should be coordinated with local CERT programs and/or Citizen Corps Councils.

Operation Stonegarden (OPSG)

OPSG provides funds to enhance cooperation and coordination among state, local, tribal, and territorial law enforcement agencies in a joint mission to secure the United States' borders along routes of ingress from international borders, including travel corridors in States bordering Mexico and Canada, and States and territories with international water borders.

This Guidance Document Is Not Applicable to OPSG

Refer to the Department of Homeland Security's FY 2019 Homeland Security Grant Program Notice of Funding Opportunity and FY 2019 Operation Stonegarden Michigan Supplemental Guidance for additional information on OPSG.

Alignment of HSGP to the National Preparedness System

The Nation uses the NPS to build, sustain, and deliver core capabilities to achieve the NPG. Subrecipients will use the National Preparedness System to support their efforts to build, sustain, and deliver these core capabilities. The components of the National Preparedness System are Identifying and Assessing Risk; Estimating Capability Requirements; Building and Sustaining Capabilities; Planning to Deliver Capabilities; Validating Capabilities; and Reviewing and Updating.

As the National Preparedness System matures, FEMA is getting better data on our capabilities as a nation that we can use to drive our focus and our resources at all levels. States and territories provide annual data on their proficiency across 32 core capabilities through the Threat and Hazard Identification and Risk Assessment, Stakeholder Preparedness Review, after-action reports, and other preparedness data. This data feeds into the National Preparedness Report and forms a shared national picture of needs relative to capability gaps—including what threats and hazards are posing the greatest risks, and what core capabilities are most in need of improvement or sustainment. Analytic results help shape prioritization decisions at FEMA and across the nation to make sure we are focusing our time and our resources in the right areas.

The HSGP provides financial support to help build, sustain, and deliver core capabilities identified in NPG. A key focus and requirement of the HSGP is to prevent terrorism and other catastrophic events and to prepare the Nation for the threats and hazards that pose the greatest risk to the security of the United States, including risks along the Nation's borders. When applicable, funding should support deployable assets that can be used anywhere in the Nation through automatic assistance and mutual aid agreements, including, but not limited to, the Emergency Management Assistance Compact (EMAC).

The HSGP supports investments that improve the ability of jurisdictions nationwide to:

- Prevent a threatened or an actual act of terrorism;
- Protect citizens, residents, visitors, and assets against the greatest threats that pose the greatest risk to the security of the United States;
- Mitigate the loss of life and property by lessening the impact of future catastrophic events;
- Respond quickly to save lives, protect property and the environment, and meet basic human needs in the aftermath of a catastrophic incident; and
- Recover through a focus on the timely restoration, strengthening, accessibility and revitalization of infrastructure, housing, and a sustainable economy, as well as the health, social, cultural, historic, and environmental fabric of communities affected by a catastrophic incident, and do so in a manner that engages the whole community while ensuring the protection of civil rights.

FEMA requires subrecipients to prioritize grant funding to demonstrate how investments support closing capability gaps or sustaining capabilities identified in the THIRA/SPR process. Minimum funding amounts are not prescribed by FEMA for these priorities; however, subrecipients are expected to support local, state, regional, and national efforts in achieving the desired outcomes of these priorities.

Homeland Security Grant Program Priorities and Requirements

Award Period of Performance

The subrecipient period of performance for this grant is included in the subrecipient grant agreement. Refer to individual grant agreements for exact effective dates.

National Incident Management System (NIMS) Implementation

Subrecipients must ensure and maintain adoption and implementation of NIMS. Incident management activities require carefully managed resources (personnel, teams, facilities, equipment and/or supplies). Utilization of the standardized resource management concepts such as typing, credentialing, and inventorying promote a strong national mutual aid capability needed to support delivery of core capabilities. Subrecipients should manage resources purchased or supported with FEMA grant funding according to NIMS resource management guidance.

Although State, Local, Tribal, and Private Sector partners, including non-governmental organizations are not required to credential their personnel in accordance with these guidelines, FEMA strongly encourages them to do so in order to leverage the Federal investment in the Federal Information Processing Standards 201 infrastructure and facilitate interoperability for personnel deployed outside their home jurisdiction. Additional information can be found at <http://fema.gov/nims-doctrine-supporting-guides-tools>.

For questions on NIMS implementation, please contact Mr. Henrik Hollaender at 517-284-3970 or HollaenderH@michigan.gov.

Emergency Management Assistance Compact (EMAC) Membership

All assets supported in part or entirely with FY 2019 HSGP funding must be readily deployable and NIMS-typed when possible to support emergency or disaster operations per existing EMAC agreements. In addition, funding may be used for the sustainment of core capabilities that, while they may not be physically deployable, support national response capabilities such as Geographic/Geospatial Information Systems, interoperable communications systems, capabilities as defined under the mitigation mission area of the NPG, and fusion centers.

Law Enforcement Terrorism Prevention Activities (LETPA)

States are required to ensure that at least 25 percent (25%) of the HSGP funds are dedicated towards law enforcement terrorism prevention activities linked to one or more core capabilities within the NPG. The LETPA allocation can be from SHSP, UASI, or both.

Activities outlined in the National Prevention Framework are eligible for use as LETPA-focused funds. Also, where capabilities are shared with the protection mission area, the National Protection Framework activities are also eligible. Other terrorism prevention activities proposed for funding under LETPA must be approved by the FEMA Administrator.

Personnel Costs

Personnel hiring, overtime, and backfill expenses are permitted under the FY 2019 HSGP grant program for allowable planning, training, exercise, and equipment activities. A personnel cap of up to 50% of the total program funds available may be used for personnel and personnel-related activities.

In general, the use of HSGP grant funding to pay for staff and/or contractor regular time or overtime/backfill is considered a personnel cost. See the FY 2019 HSGP Funding Guidelines section of this document for additional information.

Management and Administration

A maximum of 5% of subrecipient HSGP funds awarded may be used to support Management and Administration (M&A) costs associated with implementation of the grant award. Any funds retained are to be used solely for management and administrative purposes associated with the HSGP award. M&A activities are those directly relating to the management and administration of HSGP funds, such as financial management and monitoring.

Multiple Purpose or Dual-Use of Funds

For both SHSP and UASI, many activities which support the achievement of capability targets related to terrorism preparedness may simultaneously support enhanced preparedness for other hazards unrelated to acts of terrorism. However, all SHSP and UASI-funded projects must assist subrecipients in achieving capability targets related to preventing, preparing for, protecting against, responding to, or recovering from acts of terrorism.

Threat and Hazard Identification and Risk Assessment (THIRA) and Stakeholder Preparedness Review (SPR)

The THIRA includes standardized language to describe threat and hazard impacts and capability targets. This allows communities to collect more specific, quantitative information while also providing important context. Through the SPR process, communities collect more detailed and actionable data on their current capabilities and identified capability gaps. Communities then indicate their intended approaches for addressing those gaps and assess the impact of relevant funding sources on building and sustaining capabilities. The THIRA and SPR are interconnected processes that, together, communities use to evaluate their preparedness. The THIRA/SPR sets a strategic foundation for putting the National Preparedness System into action. Communities complete the THIRA every three years and use the data from the process to assess their capabilities in the SPR, which is an annual review. It is important that communities complete the THIRA on a multi-year cycle, as it enables them to assess year-over-year trends in changes to their capabilities, while still periodically reviewing the capability targets to keep them relevant. All UASI-funded Urban Areas are required to complete an update of their Urban Area THIRA every three years and an annual update to their SPR.

Building and Sustaining Capabilities

Subrecipients are required to prioritize grant funding for building and sustaining capabilities in areas with capability gaps identified through the THIRA and SPR process. All capabilities being built or sustained must have a clear linkage to one or more core capabilities in the NPG.

Improving Cybersecurity

The cybersecurity of our Nation's critical infrastructure is a top priority. National preparedness, and more specifically the protection of critical infrastructure, requires an ability to prevent and respond to cyber incidents. Subrecipients are strongly encouraged to assess their cybersecurity risks and consider the use of HSGP funds to effectively address those risks.

Subrecipients must limit the use of SHSP funds for project that support the security and functioning of critical infrastructure and core capabilities as they relate to terrorism preparedness and may simultaneously support enhanced preparedness for other hazards. Grant-funded cybersecurity activities must support or otherwise be associated with the systems and equipment that are considered allowable costs under the HSGP.

New for FY 2019, all subrecipients will be required to complete the Nationwide Cybersecurity Review (NCSR). The NCSR is open annually from October to December. In 2019, the NCSR will be open until February 14, 2020, to allow subrecipients time to comply. The NCSR provides an avenue for agencies to benchmark and measure progress of improving their cybersecurity posture. The Chief Information Officer, Chief Information Security Officer, or equivalent for each subrecipient should complete the NCSR.

Fusion Centers

The National Network of Fusion Centers (National Network) is a national asset that contributes to protecting the Homeland by providing a national capacity to identify, collect, analyze, and share information. State and local agencies that own and operate fusion centers have access to unique sources of information and maintain unique partnerships with local communities that cannot be replicated by federal agencies. These factors, combined with their operational independence from the Federal government, allow fusion centers to provide partners with a distinct perspective on threats within their jurisdictions, contributing to a more comprehensive understanding of the threats facing our nation. National Network participation in the Nationwide Suspicious Activity Reporting (SAR) Initiative enables fusion centers to receive and analyze suspicious activity reporting from frontline public safety personnel, the private sector, and the public, and ensure the sharing of SAR with the Federal Bureau of Investigation's Joint Terrorism Task Forces for further investigation. In addition to those activities identified in the National Prevention Framework, fusion centers are also encouraged to collaborate with those analytic, investigative, and information-sharing focused entities to combat transnational criminal organizations in support of efforts to enhance capabilities for detecting, deterring, disrupting, and preventing acts of terrorism.

In support of this strategic vision, all designated state and major Urban Area fusion centers are required to participate in an annual assessment of their achievement of Critical Operational Capabilities and Enabling Capabilities.

To underscore the importance of the National Network as a critical component of our Nation's distributed homeland security and counterterrorism architecture, FEMA preparedness grants will continue to prioritize support for designated fusion centers (<http://www.dhs.gov/fusion-center-locations-and-contact-information>) and the maturation of the Information Sharing Environment.

State and major Urban Area fusion centers receiving SHSP or UASI grant funds will be evaluated based on compliance with the guidance and requirements for the National Network as set forth by DHS Intelligence and Analysis through the annual Fusion Center Assessment. The Fusion Center Grant requirements are listed at <http://www.dhs.gov/homeland-security-grant-program-hsqq>. The DHS/FEMA approved analyst courses that meet the grant requirement are listed at <http://www.dhs.gov/fema-approved-intelligence-analyst-training-courses>.

Through the Program Performance Report, fusion centers will report on the compliance with measurement requirements within the fusion centers through the annual Fusion Center Assessment managed by DHS Intelligence and Analysis and reported to FEMA.

Whole Community Engagement

Whole Community is a means by which residents, emergency management practitioners, organizational and community leaders, and government officials can collectively understand and assess the needs of their respective communities and determine the best ways to organize and strengthen their assets, capacities, and interests. By doing so, a more effective path to societal

security and resilience is built. SHSP and UASI subrecipients must engage with the Whole Community to advance community and individual preparedness and work as a nation to build and sustain resilience (see <http://www.fema.gov/whole-community> for additional information). Subrecipients must also integrate the needs of children, older adults, individuals with disabilities, individuals with limited English proficiency and others with access and functional needs, socio-economic factors, and cultural diversity with SHSP and UASI funds.

Collaboration with Tribes

Subrecipients are strongly encouraged to work with Tribal nations in overall initiatives such as whole community emergency preparedness and management planning, as well as other partnership areas.

Collaboration with Nonprofit Organizations

SHSP and UASI subrecipients are encouraged to work with the nonprofit community to address terrorism and all-hazards prevention concerns, seek input on the needs of the nonprofit sector, and support the NPG of their investments.

Environmental Planning and Historic Preservation (EHP) Compliance

FEMA is required to consider the effects of its actions on the environment and/or historic properties to ensure that all activities and programs funded by the agency, including grant-funded projects, comply with Federal EHP regulations, laws, and Executive Orders, as applicable.

THE EHP REVIEW PROCESS MUST BE COMPLETED PRIOR TO INITIATING WORK ON A PROJECT. FEMA WILL NOT FUND PROJECTS THAT ARE INITIATED WITHOUT THE REQUIRED EHP REVIEW.

Subrecipients proposing projects that have the potential to impact the environment must participate in the FEMA EHP review process. The EHP review process involves the submission of a detailed project description that explains the NPG and objectives of the proposed project along with supporting documentation so that FEMA may determine whether the proposed project has the potential to impact environmental resources and/or historic properties. In some cases, FEMA is also required to consult with other regulatory agencies and the public in order to complete the review process.

Subrecipients shall not undertake any project without the prior approval of GPD and must comply with all conditions placed on the project as the result of the EHP review. Any change to the approved project description will require re-evaluation for compliance with EHP requirements. Proposed construction or renovation projects that are part of larger projects funded from a non-FEMA source (such as an Emergency Operations Center that is part of a larger proposed public safety complex), also require that a FEMA EHP review is completed before the larger project is initiated. Activities that require an EHP review include but are not limited to: construction and renovation projects, including certain installation activities; various equipment purchases such as sonar; and select training and exercise activities.

Failure of the subrecipient to meet Federal, State, Local, and Territorial EHP requirements, obtain required permits, and comply with any conditions that may be placed on the project as the result of FEMA's EHP review, will result in the denial of Federal funding. The EHP screening form must be submitted to FEMA, and the EHP review of the project must be completed and approval received before funds are released to carry out the proposed

project. Any project initiated prior to receiving EHP approval will result in a non-compliance finding and will not be eligible for funding.

For questions concerning applicability of any specific project or activity to the EHP Program, or for assistance with completing the required Environmental and Historic Preservation Screening Memo, please contact EMD_HSGP@michigan.gov.

Additionally, all subrecipients are required to comply with FEMA EHP Policy Guidance, FEMA Policy #108-023-1. The EHP screening form is located <https://www.fema.gov/media-library/assets/documents/90195>, and further EHP guidance can be found at <https://www.fema.gov/media-library/assets/documents/118323>.

Emergency Operations Plans (EOP)

Subrecipients should develop, maintain, or revise as necessary, jurisdiction-wide, all threats and hazards EOPs consistent with the Comprehensive Preparedness Guide (CPG) 101 Version 2.0, Developing and Maintaining Emergency Operations Plans. CPG 101 v.2 serves as the foundation for State, local, Tribal, and Territory emergency planning. EOPs should be updated at least once every two years.

Ensuring the Protection of Civil Rights

As the Nation works towards achieving the NPG, it is important to continue to protect the civil rights of individuals. Subrecipients must carry out their programs and activities, including those related to the building, sustainment, and delivery of core capabilities, in a manner that respects and ensures the protection of civil rights for protected populations. These populations include, but are not limited to, individuals with disabilities and others with access and functional needs, individuals with limited English proficiency, and other diverse racial and ethnic populations in accordance with Section 504 of the Rehabilitation Act of 1973, Title VI of the Civil Rights Act of 1964, and related statutes. The DHS Standard Terms and Conditions include the civil rights provisions that apply to subrecipients. These terms and conditions can be found in the DHS Standard Terms and Conditions. Additional information on civil rights provisions is available at <http://www.fema.gov/office-equal-rights>.

FY 2019 HSGP Funding Guidelines

Subrecipients must comply with all the requirements in 2 C.F.R. Part 200 (*Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*).

In general, subrecipients should consult with their MSP/EMHSD Grant Analyst prior to making any investment that does not clearly meet the allowable expense criteria. Funding guidelines established within this section support the five mission areas—Prevention, Protection, Mitigation, Response, and Recovery—and associated core capabilities within the NPG. Allowable investments made in support of the HSGP priorities as well as other capability-enhancing projects must have a nexus to terrorism preparedness and fall into the categories of planning, organization, exercises, training, or equipment, aligned to closing capability gaps or sustaining capabilities identified in the THIRA/SPR. Subrecipients are encouraged to use grant funds for evaluating grant-funded project effectiveness and return on investment.

Multiple Purpose or Dual-Use of Funds

For both SHSP and UASI, many activities that support the achievement of core capabilities related to terrorism preparedness may simultaneously support enhanced preparedness for other hazards unrelated to acts of terrorism. However, all SHSP- and UASI- funded projects must assist recipients and subrecipients in achieving core capabilities related to preventing, preparing for, protecting against, or responding to acts of terrorism.

Planning (SHSP and UASI)

SHSP and UASI funds may be used for a range of emergency preparedness and management planning activities such as those associated with the development, review, and revision of the THIRA, SPR, continuity of operations plans, and other planning activities that support the NPG and placing an emphasis on updating and maintaining a current EOP that conforms to the guidelines outlined in CPG 101 v2.

Organization (SHSP and UASI)

Subrecipients must justify proposed expenditures of SHSP or UASI funds to support organization activities within their Investment Justification (IJ) submission. Organizational activities include:

- Program management
- Development of whole community partnerships, through groups such as Citizen Corp Councils
- Structures and mechanisms for information sharing between the public and private sector
- Implementing models, programs, and workforce enhancement initiatives to address ideologically inspired radicalization to violence in the homeland
- Tools, resources, and activities that facilitate shared situational awareness between the public and private sectors
- Operational Support
- Utilization of standardized resource management concepts such as typing, inventorying, organizing, and tracking to facilitate the dispatch, deployment, and recovery of resources before, during, and after an incident

- Responding to an increase in the threat level under the National Terrorism Advisory System (NTAS) or needs resulting from a National Special Security Event
- Paying salaries and benefits for personnel to serve as qualified Intelligence Analysts. Per the *Personnel Reimbursement for Intelligence Cooperation and Enhancement (PRICE) of Homeland Security Act*, Pub. L. No. 110-412, § 2, codified in relevant part, as amended, at 6 U.S.C. § 609(a), SHSP and UASI funds may be used to hire new staff and/or contractor positions to serve as intelligence analysts to enable information/intelligence sharing capabilities, as well as support existing intelligence analysts previously covered by SHSP or UASI funding. See 6 U.S.C. § 609(a). To be hired as an intelligence analyst, staff and/or contractor personnel must meet at least one of the following criteria:
 - Complete training to ensure baseline proficiency in intelligence analysis and production within six months of being hired; and/or,
 - Previously served as an intelligence analyst for a minimum of two years either in a federal intelligence agency, the military, or state and/or local law enforcement intelligence unit.
- All fusion center analytical personnel must demonstrate qualifications that meet or exceed competencies identified in the Common Competencies for state, local, and tribal Intelligence Analysts, which outlines the minimum categories of training needed for intelligence analysts. A certificate of completion of such training must be on file with the State Administrative Agency (SAA) and must be made available to the recipient's respective FEMA HQ Program Analyst upon request.

Subrecipients are allowed to use up to 50 percent of their SHSP funding, and all high-risk urban areas are allowed to use up to 50 percent of their UASI funding, for personnel costs. Personnel hiring, overtime, and backfill expenses are permitted under this grant only to the extent that such expenses are for the allowable activities within the scope of the grant. Personnel expenses may include but are not limited to training and exercise coordinators, program managers and planners, intelligence analysts, and Statewide Interoperability Coordinators.

Organizational activities under SHSP and UASI include:

Operational Overtime Costs

In support of efforts to enhance capabilities for detecting, deterring, disrupting, and preventing acts of terrorism, operational overtime costs are allowable for increased protective security measures at critical infrastructure sites or other high-risk locations and to enhance public safety during mass gatherings and high-profile events. In that regard, HSGP subrecipients are urged to consider using grant funding to support soft target preparedness activities. SHSP or UASI funds may be used to support select operational expenses associated with increased security measures in the authorized categories cited in the table below, but this table is not exhaustive. FEMA retains the discretion to approve other types of requests that do not fit within one of the categories of the table.

Table 1: Authorized Operational Overtime Categories Category		Description
1	National Terrorism Advisory System (NTAS)	Security measures in response to an increase in the threat level under the NTAS to an “elevated” or “imminent” alert status. GPD Information Bulletin No. 367, <i>Impact of National Terrorism Advisory System on</i>

		<i>Homeland Security Grant Programs</i> , remains applicable.
2	National Security Special Event (NSSE)	Security measures for a designated NSSE. NSSEs are events of national or international significance deemed by DHS to be a potential target for terrorism or other criminal activity.
3	Special Event Assessment Rating (SEAR) Level 1 through Level 4 Events	<p>Security measures required for SEAR Level 1 through Level 4 events as designated by the Department of Homeland Security (DHS) and included in the DHS National Special Events List, as defined below:</p> <ul style="list-style-type: none"> • SEAR 1: A significant event with national and/or international importance that may require extensive Federal interagency support; • SEAR 2: A significant event with national and/or international importance that may require some level of Federal interagency support. • SEAR 3: An event of national and/or international importance that requires only limited Federal support. • SEAR 4: An event with limited national importance that is managed at state and local level. <p>NOTE: In cases where a threat of terrorism can be associated with a SEAR Level 5 event, the event planners should coordinate with their state or territory Homeland Security Advisor to seek re-adjudication of the SEAR rating. Operational overtime for security measures associated with such events will be considered for approval by FEMA if re-adjudication results in a SEAR 1 through 4 rating.</p>
4	States of Emergency	Declarations of states of emergency by the Governor associated with a terrorism-related threat or incident . This excludes Presidentially declared major disasters or emergencies where Federal funding support for the proposed grant-funded activity is made available through the FEMA Public Assistance program or other Federal disaster grants.
5	National Critical Infrastructure Prioritization Program (NCIPP)	Protection of Level 1 and Level 2 facilities identified through the Department of Homeland Security's NCIPP based on a terrorism-related threat to critical infrastructure.
6	Directed Transit Patrols	Targeted security patrols in airports and major transit hubs based on a terrorism-related threat to transportation systems.
7	Other Related Personnel Overtime Costs	Overtime costs may be authorized for personnel assigned to directly support any of the security activities relating to the categories above. Examples

		include firefighters and emergency medical services personnel; public works employees who may be responsible for installing protective barriers and fencing; public safety personnel assigned to assist with event access and crowd control; emergency communications specialists; fusion center analysts; National Guard; contract security services; etc.
8	Operational Support to a Federal Agency	Overtime costs are allowable for personnel to participate in information, investigative, and intelligence sharing activities related to homeland security/terrorism preparedness and specifically requested by a Federal agency. Allowable costs are limited to overtime associated with Federally requested participation in eligible activities, including anti-terrorism task forces, Joint Terrorism Task Forces (JTTFs), Area Maritime Security Committees (as required by the Maritime Transportation Security Act of 2002), DHS Border Enforcement Security Task Forces, and Integrated Border Enforcement Teams. In addition, reimbursement for operational overtime law enforcement activities related to combating transnational crime organizations in support of efforts to enhance capabilities for detecting, deterring, disrupting, and preventing acts of terrorism is an allowable expense under SHSP and UASI on a case-by-case basis. Grant funding can only be used in proportion to the Federal man-hour estimate and only after funding for these activities from other Federal sources (i.e., FBI JTTF payments to state and local agencies) has been exhausted.

All allowable operational overtime costs are also subject to the administration requirements outlined in the following subsection.

Administration of Operational Overtime Requests:

- Except for an elevated National Security Special Event alert, SHSP or UASI funds may only be spent for operational overtime costs upon prior written approval by FEMA. FEMA will consider requests for special event activities up to one year in advance. However, such requests must be within the award's current period of performance and must not result in the need for a request to extend the period of performance.
- All operational overtime requests must clearly explain how the request meets the criteria of one or more of the categories listed in the table above. Requests must address the threat environment as it relates to the event or activity requiring operational overtime support and explain how the overtime activity is responsive to the threat.

- Post-event operational overtime requests will only be considered on a case-by-case basis, where it is demonstrated that exigent circumstances prevented submission of a request in advance of the event or activity.
- Under no circumstances may FEMA grant funding be used to pay for costs already supported by funding from another federal source.

Personnel Costs

Personnel hiring, overtime, and backfill expenses are permitted under this grant to perform allowable HSGP planning, training, exercise, and equipment activities. Personnel may include but are not limited to training and exercise coordinators, program managers for activities directly associated with SHSP and UASI funded activities, intelligence analysts, and Statewide Interoperability Coordinators.

For further details, refer to Information Bulletin No. 421, Clarification on the Personnel Reimbursement for Intelligence Cooperation and Enhancement of Homeland Security Act of 2008 (Public Law 110–412 – the PRICE Act), Aug. 22, 2017, or contact the MSP/EMHSD.

HSGP funds may not be used to support the hiring of any personnel to fulfil traditional public health and safety duties nor to supplant traditional public health and safety positions and responsibilities.

The following definitions apply to personnel costs:

- *Hiring.* State and local entities may use grant funding to cover the salary of newly hired personnel who are exclusively undertaking allowable FEMA grant activities as specified in this guidance. This may not include new personnel who are hired to fulfill any non-FEMA program activities under any circumstances. Hiring will always result in a net increase of Full Time Equivalent employees.
- *Overtime.* These expenses are limited to the additional costs that result from personnel working over and above 40 hours of weekly work time as the direct result of their performance of FEMA-approved activities specified in this guidance. Overtime associated with any other activity is not eligible.
- *Backfill-Related Overtime.* Also called “Overtime as Backfill,” these expenses are limited to overtime costs that result from personnel who are working overtime (as identified above) to perform the duties of other personnel who are temporarily assigned to FEMA-approved activities outside their core responsibilities. Neither overtime nor backfill expenses are the result of an increase of FTE employees.
- *Supplanting.* Grant funds will be used to supplement existing funds and will not replace (supplant) funds that have been appropriated for the same purpose. Subrecipients may be required to supply documentation certifying that a reduction in non-federal resources occurred for reasons other than the receipt or expected receipt of federal funds.

Equipment (SHSP and UASI)

The 21-allowable prevention, protection, mitigation, response, and recovery equipment categories for HSGP are listed on the Authorized Equipment List (AEL). The AEL is available at <http://www.fema.gov/authorized-equipment-list>. Some equipment items require prior approval from FEMA before obligation or purchase of the items. Please reference the grant

notes for each equipment item to ensure prior approval is not required or to ensure prior approval is obtained if necessary.

Unless otherwise stated, all equipment must meet all mandatory regulatory and/or FEMA-adopted standards to be eligible for purchase using these funds. In addition, subrecipients will be responsible for obtaining and maintaining all necessary certifications and licenses for the requested equipment.

Investments in emergency communications systems and equipment must meet applicable SAFECOM Guidance. Such investments must be coordinated with the Statewide Interoperability Coordinators, and the State Interoperability Governing Body to ensure interoperability and long-term compatibility.

Grant funds may be used for the procurement of medical countermeasures. Procurement of medical countermeasures must be conducted in collaboration with state, city, or local health departments that administer federal funds from Health and Human Services for this purpose and with existing MMRS committees where available, to sustain their long-term planning for appropriate, rapid, and local medical countermeasures, including antibiotics and antidotes for nerve agents, cyanide, and other toxins. Procurement must have a sound threat-based justification with an aim to reduce the consequences of mass casualty incidents during the first crucial hours of a response. Prior to procuring pharmaceuticals, subrecipients must have in place an inventory management plan to avoid large periodic variations in supplies due to coinciding purchase and expiration dates. Subrecipients are encouraged to enter into rotational procurement agreements with vendors and distributors. Purchases of pharmaceuticals must include a budget for the disposal of expired drugs within each fiscal year's Period of Performance (PoP) for HSGP. The cost of disposal cannot be carried over to another FEMA grant or grant period.

Emergency Medical Services electronic patient care data systems should comply with the most current data standard of the National Emergency Medical Services Information System (www.NEMSIS.org).

Requirements for Small Unmanned Aircraft System (SHSP, UASI, and OPSG)

All requests to purchase Small Unmanned Aircraft Systems with FEMA grant funding must comply with Information Bulletin (IB) 426 (please note when developing your UAS policies and procedures pay particular attention to the 2015 Presidential Memorandum: Promoting Economic Competitiveness While Safeguarding Privacy, Civil Rights, and Civil Liberties in Domestic Use of Unmanned Aircraft Systems) and also include a description of the policies and procedures in place to safeguard individuals' privacy, civil rights, and civil liberties of the jurisdiction that will purchase, take title to or otherwise use the Small Unmanned Aircraft System equipment.

Training (SHSP and UASI)

Allowable training-related costs under HSGP include the establishment, support, conduct, and attendance of training specifically identified under the SHSP and UASI program and/or in conjunction with emergency preparedness training by other federal agencies (e.g., Health and Human Services and Department of Transportation). Training conducted using HSGP funds should address a performance gap identified through a training and exercise plan or other assessments (e.g., National Emergency Communications Plan Goal Assessments) and contribute to building a capability that will be evaluated through a formal exercise. Any training or training gaps, including training related to under-represented diverse populations that may be more impacted by disasters, including children, seniors, individuals with disabilities or access

and functional needs, individuals with diverse culture and language use, individuals with lower economic capacity and other underserved populations, should be identified in a training an exercise plan and addressed in the state or high-risk urban area training cycle.

Subrecipients are encouraged to use existing training rather than developing new courses. When developing new courses, subrecipients are encouraged to apply the Analyze, Design, Develop, Implement, and Evaluate model of instructional design. Subrecipients are also encouraged to utilize the National Training and Education Division's National Preparedness Course Catalog. Trainings include programs or courses developed for and delivered by institutions and organizations funded by DHS/FEMA/National Training and Education Division. This includes the Center for Domestic Preparedness, the Emergency Management Institute, and the National Training and Education Division's Training Partner Programs, including the Continuing Training Grants, the National Domestic Preparedness Consortium, the Rural Domestic Preparedness Consortium, and other partners.

The catalog features a wide range of course topics in multiple delivery modes to meet FEMA's mission scope as well as the increasing training needs of federal, state, local, territorial, and tribal audiences. All courses have been approved through the National Training and Education Division's course review and approval process. The catalog can be accessed at <http://www.firstrespondertraining.gov>.

Exercises (SHSP and UASI)

Exercises conducted with grant funding should be managed and conducted consistent with The Homeland Security Exercise and Evaluation Program. The guidance for exercise design, development, conduct, evaluation, and improvement planning is located at <https://www.fema.gov/exercise>.

Maintenance and Sustainment (SHSP, UASI, and OPSG)

The use of FEMA preparedness grant funds for maintenance contracts, warranties, repair or replacement costs, upgrades, and user fees are allowable, as described in FEMA Policy FP 205-402-125-1 under all active and future grant awards, unless otherwise noted. Except for maintenance plans or extended warranties purchased incidental to the original purchase of the equipment, the period covered by maintenance or warranty plan must not exceed the PoP of the specific grant funds used to purchase the plan or warranty.

Grant funds are intended to support the NPG by funding projects that build and sustain the core capabilities necessary to prevent, protect against, mitigate the effects of, respond to, and recover from those threats that pose the greatest risk to the security of the Nation. In order to provide subrecipients the ability to meet this objective, the policy set forth in FEMA's IB 379, Guidance to State Administrative Agencies to Expedite the Expenditure of Certain FEMA Grant Funding, initially for FY 2007-2011, allows for the expansion of eligible maintenance and sustainment costs which must be in (1) direct support of existing capabilities; (2) must be an otherwise allowable expenditure under the applicable grant program; (3) be tied to one of the core capabilities in the five mission areas contained within the NPG, and (4) shareable through the Emergency Management Assistance Compact. Additionally, eligible costs may also be in support of equipment, training, and critical resources that have previously been purchased with either federal grant or any other source of funding other than FEMA preparedness grant program dollars.

Law Enforcement Terrorism Prevention Activities Allowable Costs (SHSP and UASI)

Activities eligible for the use of LETPA focused funds include but are not limited to:

- Maturation and enhancement of designated state and major high-risk urban area fusion centers, including information sharing and analysis, threat recognition, terrorist interdiction, and training/ hiring of intelligence analysts;
- Coordination between fusion centers and other analytical and investigative efforts including, but not limited to Joint Terrorism Task Forces, Field Intelligence Groups, The High Intensity Drug Trafficking Area program, Regional Information Sharing System Centers, criminal intelligence units, and real-time crime analysis centers;
- Implementation and maintenance of the nationwide SAR Initiative, including training for front-line personnel on identifying and reporting suspicious activities;
- Implementation of the “If You See Something, Say Something®” campaign to raise public awareness of indicators of terrorism and terrorism-related crime and associated efforts to increase the sharing of information with public and private sector partners, including nonprofit organizations. Note: DHS requires that all public and private sector partners wanting to implement and/or expand the DHS “If You See Something, Say Something” campaign using grant funds work directly with the DHS Office of Partnership and Engagement to ensure all public awareness materials (e.g., videos, posters, tri-folds, etc.) are consistent with the DHS’s messaging and strategy for the campaign and compliant with the initiative’s trademark, which is licensed to DHS by the New York Metropolitan Transportation Authority. Coordination with the Office of Partnership and Engagement, through the Campaign’s Office (seesay@hq.dhs.gov), must be facilitated by the FEMA HQ Program Analyst;
- Increase physical security, through law enforcement personnel and other protective measures, by implementing preventive and protective measures at critical infrastructure site or at-risk nonprofit organizations; and
- Building and sustaining preventive radiological and nuclear detection capabilities, including those developed through the Securing the Cities initiative.

Construction and Renovation (SHSP and UASI)

Project construction using SHSP and UASI funds may not exceed the greater of \$1,000,000 or 15 percent of the grant award. For the purposes of the limitations on funding levels, communications towers are not considered construction. See guidance on communication towers below.

Written approval must be provided by FEMA prior to the use of any HSGP funds for construction or renovation. When applying for construction funds, subrecipients must submit evidence of approved zoning ordinances, architectural plans, and any other locally required planning permits. Additionally, subrecipients are required to submit a SF-424C form with budget detail citing the project costs.

Subrecipients using funds for construction projects must comply with the *Davis-Bacon Act* (codified as amended at 40 U.S.C. §§ 3141 *et seq.*). subrecipients must ensure that their contractors or subcontractors for construction projects pay workers no less than the prevailing wages for laborers and mechanics employed on projects of a character like the contract work in the civil subdivision of the State in which the work is to be performed. Additional information

regarding compliance with the *Davis-Bacon Act*, including Department of Labor wage determinations, is available online at <https://www.dol.gov/whd/govcontracts/dbra.htm>.

Western Hemispheric Travel Initiative (SHSP)

In addition to the expenditures outlined above, SHSP funds may be used to support the implementation activities associated with the Western Hemisphere Travel Initiative (WHTI), including the issuance of WHTI-compliant tribal identification cards.

28 CFR Part 23 Guidance

FEMA requires that any information technology system funded or supported by these funds comply with 28 CFR, Part 23, Criminal Intelligence Systems Operating Policies if this regulation is determined to be applicable.

Unallowable Costs (SHSP, UASI, and OPSG):

- Per FEMA policy, the purchase of weapons and weapons accessories, including ammunition, is not allowed with HSGP funds.
- Grant funds may not be used for the purchase of equipment not approved by FEMA. Grant funds must comply with IB 426 and may not be used for the purchase of the following equipment: firearms; ammunition; grenade launchers; bayonets; or weaponized aircraft, vessels, or vehicles of any kind with weapons installed.
- Unauthorized exercise-related costs include:
 - Reimbursement for the maintenance or wear and tear costs of general use vehicles (e.g., construction vehicles), medical supplies, and emergency response apparatus (e.g., fire trucks, ambulances).
 - Equipment that is purchased for permanent installation and/or use, beyond the scope of the conclusion of the exercise (e.g., electronic messaging sign).

FY 2019 HSGP – SHSP Investments

The Michigan FY 2019 HSGP-SHSP Investment Justification is comprised of multiple investments designed to enhance statewide capabilities in specific core areas, in alignment with Federal and statewide initiatives.

Stakeholder Preparedness Review Alignment

The FY 2019 SHSP investments are derived from specific capability shortfalls identified through the annual THIRA and SPR process.

The THIRA is a three-step risk assessment completed every three years. It helps communities answer the following questions:

- What threats and hazards can affect our community?
- If they occurred, what impacts would those threats and hazards have on our community?
- Based on those impacts, what capabilities should our community have?

The THIRA helps communities understand their risks and determine the level of capability they need in order to address those risks. The outputs from this process lay the foundation for determining a community's capability gaps during the SPR process. The FY 2019 SHSP investment descriptions are based upon the functional gaps identified in the SPR.

HSGP Project Workbook:

The HSGP project workbooks are designed to establish a link between subrecipient investment projects, investment descriptions, and the THIRA and SPR. Subrecipients must identify specific functional areas where capability gaps exist that will be addressed by their projects, based upon the core capability that the project supports. Establishing this link will validate investment alignment as well as alignment to the THIRA and SPR. Functional areas where capability gaps exist within each core capability are provided in Appendix C of this document. An example of a project description which identifies the applicable core capability functional gap(s) is provided below. Please refer to the FY 2019 HSGP project workbook instructions for additional information.

HSGP PROJECT DESCRIPTION EXAMPLE:

Project Title: Critical Infrastructure and Key Resource (CIKR) Resilience

Core Capability: Physical Protective Measures

This project will continue to identify and prioritize key critical infrastructure sites and conduct vulnerability assessments. The assessments are an ongoing initiative to evaluate the top 10 CIKR sites in the region and identify the most effective means of hardening the facilities or infrastructure. Completion of the assessments is anticipated within this calendar year; however, FY 2019 funds will also be used to implement physical protective measures and provide training for CIKR security staff. Public outreach may also be conducted to educate the public and encourage reporting of suspicious activities in or around CIKR sites. This project addresses functional areas where capability gaps exist, as identified in the SPR, including: identifying and

prioritizing assets to protect; physical security measures; and site-specific and process-specific risk assessments.

Supported Functional Areas Where Capability Gaps Exist:

- Identifying and prioritizing assets to protect
- Physical security measures
- Site-specific and process-specific risk assessments

The FY 2019 Michigan HSGP – SHSP Investments include (not in priority order):

1. Critical Infrastructure and Key Resources
2. Homeland Security Planning
3. Operational Preparedness and Response
4. Terrorism Prevention and Protection
5. Chemical, Biological, Radiological, Nuclear, and Explosive (CBRNE) Response Capabilities
6. Community Readiness and Resilience
7. Catastrophic Incident Response Capabilities
8. Michigan Cybersecurity
9. Operational Emergency Communications

The FY 2019 HSGP funding must be utilized to build and sustain core capabilities within the NPG. In addition, all projects must be aligned with capability targets and gaps identified through the THIRA/SPR process.

Specialized Response Assets: All Regions are expected to sustain the capabilities of specialized response assets such as the Regional Response Team Network and Search and Rescue teams and capabilities. Support should be provided through appropriate planning, equipment, training, and exercise activities.

Important: When making SHSP and UASI expenditures, they must be consistent with the investment descriptions included in the FY 2019 SHSP or UASI Investment Justification, respectively. All investment expenditures must also be included in the subrecipient project workbooks. Before any SHSP and UASI expenditures can be made, all individual solution area costs must be reviewed and approved by MSP/EMHSD via the Alignment and Allowability Form (AAF). The FY 2019 HSGP - UASI Investment Justification is available to the Southeast Michigan UASI Region through the regional fiduciary or MSP/EMHSD.

Investment # 1: Critical Infrastructure and Key Resources

Core Capabilities:

- Access Control and Identity Verification
- Physical Protection Measures
- Risk Management for Protection Programs and Activities
- Supply Chain Integrity and Security

Investment Description:

This investment will support programs to strengthen and maintain secure, functioning, and resilient critical infrastructure. Michigan will continue the work to expand capabilities and eliminate capability shortfalls in the following core capabilities: Access Control and Identity Verification; Physical Protective Measures; Risk Management for Protection Programs and Activities; and Supply Chain Integrity and Security. The functional areas with capability shortfalls in Access Control and Identity Verification that will be addressed include controlling cyber access; controlling physical access; and verifying identity. The functional area shortfalls in Physical Protective Measures that will be addressed include biosecurity; border protection; identifying and prioritizing assets to protect; site-specific and process specific risk assessments; and physical security measures. The functional area shortfalls in Risk Management for Protection Programs and Activities that will be addressed include analysis tools; data collection; incorporating risk assessments in exercise design; risk assessment; risk communication; and risk management planning. The functional area shortfalls in Supply Chain Integrity and Security that will be addressed include analysis of supply chain dependencies; implementing countermeasures; implementing physical protection; integrating security processes; and verification and detection. Each of these core capabilities is a medium priority with capability ratings of three or lower for each Planning, Organization, Equipment, Training, and Exercise (POETE) element. Continuing to strengthen these capabilities will ensure the security and resilience of Michigan's vital assets, systems, and networks.

Investment # 2: Homeland Security Planning

Core Capabilities:

- Planning
- Long-term Vulnerability Reduction
- Risk and Disaster Resilience Assessment
- Threats and Hazards Identification

Investment Description:

This investment supports the National Preparedness System through planning efforts designed to build and sustain Michigan's capacity to address threats and hazards facing whole community members. The primary core capability addressed by this investment is Planning, where several shortfalls were identified. Additional core capabilities supported by this investment include: Long-term Vulnerability Reduction; Risk and Disaster Resilience Assessment; and Threats and Hazards Identification, with shortfalls identified in the 2019 SPR will also be addressed. The Planning core capability is supported through sustaining existing capabilities and addressing shortfalls in the following functional areas: Continuity planning;

including individuals with disabilities or people with Access or Functional Needs; incorporating risk analyses; pre-incident planning; strategic planning; Evaluating and updating plans; operational planning; whole community involvement and coordination; and integrating different plans. The functional area shortfalls in Threat and Hazards Identification include data collection and sharing; estimating frequency and magnitude; modeling and analysis; and stakeholder collaboration/coordination. The functional area shortfalls in Risk and Disaster Resilience Assessment that will be addressed include modeling and analysis; education and training; and obtaining and sharing data. Finally, the functional area shortfalls in Long-term Vulnerability Reduction that will be addressed include individual and family preparedness and developing neighborhood civic organizations. Sustaining and building effectiveness in the Planning core capability is the priority of this investment because Michigan needs to ensure effective and efficient functioning in emergency and disaster situations. Planning continues to be a high priority in the SPR with gaps identified in four of the five POETE areas. Strengthening planning and preparedness activities is an essential component of protecting life, ensuring safety and building resilient communities.

Investment # 3: Operational Preparedness and Response

Core Capabilities:

- Operational Coordination
- Situational Assessment
- Fire Management Suppression

Investment Description:

This investment will sustain existing and build new capabilities to improve competencies in operational preparedness and response and to achieve the capability targets established in the THIRA. Core capabilities that are addressed by this investment are: Operational Coordination; Situational Assessment; and Fire Management and Suppression. There are shortfalls in all five POETE areas for each of these core capabilities making operational preparedness and response a high priority area. The functional area shortfalls in Operational Coordination addressed by this investment include Allocating and mobilizing resources; emergency operations center management; Ensuring COG and essential services; establishing roles and responsibilities, Command, control, and coordination, NIMS/ICS compliance, Stakeholder engagement, determining priorities, objectives, strategies, ensuring information flow, ensuring unity of effort, establishing a common operating picture, and establishing lines of communication. Functional area shortfalls in Situational Assessment include: analyzing information; assessing hazard impacts; and tracking response activities; delivering situation reports; and stakeholder engagement. Finally, the functional area shortfalls in Fire Management and Suppression that will be addressed include: Wildland firefighting; specialized firefighting; initial attack firefighting; extended attack firefighting; and structural firefighting. These three core capabilities continue to be a high priority to sustain and expand Michigan's Operational Preparedness and Response.

Investment # 4: Terrorism Prevention and Protection

Core Capabilities:

- Intelligence and Information Sharing
- Interdiction and Disruption
- Screening, Search, and Detection
- Forensics and Attribution

Investment Description:

The Terrorism Prevention and Protection investment will strengthen and sustain Michigan's capabilities to prevent, avoid, or stop a threatened or actual act of terrorism, to include preparing for non-traditional attacks. Michigan will continue to build capabilities and eliminate capability shortfalls in the following core capabilities: Intelligence and Information Sharing; Interdiction and Disruption; Screening, Search, and Detection, and Forensics and Attribution. The functional area shortfalls in Intelligence and Information Sharing that will be addressed include establishing intelligence and information requirements; analysis of intelligence and information; continuous threat assessment; safeguarding sensitive information; developing reports and products; disseminating intelligence and information; exploiting and processing information; feedback and evaluation; gathering intelligence; and monitoring information. Functional area shortfalls in Interdiction and Disruption include anti-terrorism operations; border security; CBRNE detection; CBRNE render safe; deterrent law enforcement presence; tactical law enforcement operations; tracking and targeting terrorists and their weapons; wide-area search and detection; interdicting cargo, conveyances, and persons; financial disruption, and preventing acquisition of CBRNE. Functional areas with gaps in Screening, Search and Detection include electronic search; explosives detection; locating terrorists; physical investigation; wide-area search; promoting an observant nation; radiological and nuclear detection, screening, bio-surveillance, chemical and biological detection, and laboratory testing. The functional area shortfalls in Forensics and Attribution that will be addressed include assessing terrorist capabilities; CBRNE material analysis; crime scene preservation and exploitation; and evidence collection. This investment is a priority because it directly supports the Prevention mission area which is the only mission area specifically targeting prevention of an initial or follow on attack, making it a fundamental component of any counterterrorism effort. Activities funded in this investment may also support the protection mission area where capabilities are shared.

Investment # 5: CBRNE Response Capabilities

Core Capabilities:

- Environmental Response/Health and Safety
- Mass Search and Rescue Operations
- On-scene Security, Protection, and Law Enforcement

Investment Description:

This investment will allow Michigan to build and sustain response capabilities for chemical, biological, radiological, nuclear or explosive CBRNE incidents. This investment will address specific functional gaps in the following core capabilities: Environmental Response/Health and

Safety; Mass Search and Rescue Operations; and On-scene Security, Protection and Law Enforcement. The functional area shortfalls in Environmental Response/Health and Safety that will be addressed include hazardous materials clean-up; health and safety monitoring and assessment; responder safety; survivor safety and assistance; decontamination; debris removal; environmental impact analysis; and predictive modeling. The functional area shortfalls in Mass Search and Rescue that will be addressed include rescue operations; search operations; specialized operations; synchronizing operations; and community-based search and rescue. Lastly, the functional area shortfalls in On-scene Security, Protection, and Law Enforcement that will be addressed include Law Enforcement; protecting response personnel; and securing disaster areas. All three core capabilities have a direct impact on life and are rated as a medium priority with identified gaps in at least four out of five POETE areas.

Investment # 6: Community Readiness and Resilience

Core Capability:

- Community Resilience
- Public Information and Warning
- Infrastructure Systems
- Economic Recovery
- Health and Social Services
- Logistics and Supply Chain Management

Investment Description:

This investment will allow Michigan to sustain capabilities that support community readiness and resilience and address shortfalls in high priority capabilities. This investment will address specific gaps in the following core capabilities: Community Resilience; Public Information and Warning; Infrastructure Systems; Economic Recovery; Health and Social Services; and Logistics and Supply Chain Management. Community Resilience gaps that will be addressed are included in the following functional areas: communication and outreach; education and skill building; understanding the community; collaborative planning and decision-making; and partnership building. The functional area shortfalls in Public Information and Warning that will be addressed include Developing standard operating procedures for Public Information; new communications tools and technology; Protecting Sensitive information; Public awareness campaigns; traditional communications mechanisms; alerts and warnings; culturally and linguistically appropriate messaging; delivering actionable guidance; and inclusiveness of the entire public. The functional shortfalls in Infrastructure Systems covered by this investment include: Food Production and Delivery; Government Facilities; Heating Fuel Provision; Hospitals; Infrastructure Site Assessments; Communication systems, Power Restoration, Sanitation, and Water Treatment and provision. The 2018 SPR process identified significant gaps in coordination between public sector and private sector infrastructure system owners/operators. Health and Social Services gaps include: School impacts, public awareness, medical products and services. Economic Recovery gaps include: continuity planning; recovery objectives; economic impact assessments; and disseminating information. Finally, the functional area shortfalls in Logistics and Supply Chain Management include: Access to Community Staples; Donations Management; Emergency Power Provision; Fuel Support; Private Resources; Resource Tracking; Supply Chain Restoration; Volunteer Management; resource delivery; and resource management. This investment is a priority because Public Information

and Warning; Infrastructure Systems; and Logistics and Supply Chain Management have a direct impact on life and safety. While Community Resilience does not directly impact life, it is vital to the recovery process and the other capabilities.

Investment # 7: Catastrophic Incident Response Capabilities

Core Capabilities:

- Critical Transportation
- Mass Care Services
- Public Health, Healthcare, and Emergency Medical Services
- Fatality Management Services

Investment Description:

The Catastrophic Incident Response investment will strengthen and sustain Michigan's ability to respond to catastrophic incidents. Identified gaps will be addressed in the following core capabilities: Critical Transportation; Mass Care Services; Public Health, Healthcare, and Emergency Medical Services; and Fatality Management Services. The functional areas with gaps in Critical Transportation include Evacuation; Establishing Access; Debris Removal; Airspace Management; Delivery of Response Assets; Reentering Affected Area; and Transportation Safety and Condition Assessments. The functional area shortfalls in Mass Care Services that will be addressed include Sheltering; Ensuring Access; Feeding; Hydration; Pets; Resource Distribution; Relocation Assistance; and Family Reunification. Shortfalls in Public Health, Healthcare, and Emergency Medical Services include the following functional areas: Triage and Initial Stabilization; Emergency Medical Services; Definitive Care; Clinical Laboratory Testing; Health Assessments; Medical Countermeasures; Medical Surge; and Public Health Interventions. Lastly, the functional area shortfalls in Fatality Management Services that will be addressed include Body Recovery; Mortuary Services; Victim Identification; Bereavement Counseling; and Family Reunification. These core capabilities are a priority and each capability has gaps in all five POETE areas. This investment will allow Michigan to close those gaps and launch effective responses to catastrophic incidents.

Investment # 8: Michigan Cybersecurity

Note: All projects supporting Cybersecurity must align to this investment. While this investment only cites the Cybersecurity core capability, projects aligned to other core capabilities but also supporting cybersecurity are also required to be aligned to this investment.

Core Capabilities:

- Cybersecurity

Investment Description:

While Michigan prioritizes cybersecurity, the threat of a cyber-attack is persistent and as the world becomes increasingly dependent upon the internet, developing and improving capabilities to protect the security of systems and people is critical. To minimize the risk of attacks to Michigan's cyber infrastructure, gaps identified in the State Preparedness Report under the Cybersecurity core capability will be addressed by this investment. Functional areas where gaps were identified include: controlling electronic access; guidelines, regulations, and standards; protective measures; detecting malicious activities; securing Critical Infrastructure and Key

Resource and Supervisory Control and Data Acquisition systems; sharing threat information; technical countermeasures; continuity of operations for cyber systems; investigating malicious actors; and end user awareness. Despite significant investments, Michigan does not rate above a 3 in any solution area in the Cybersecurity core capability. The SPR also identified more detailed and specific needs such as strengthening encryption and continuing and expanding current training and exercise efforts. Michigan's 2017 cyber tabletop exercise also identified a need to develop cyber response plans within public and private organizations. Although Michigan maintains a robust cybersecurity program, public and private sector partners remain vulnerable. Cybersecurity is a high priority core capability and with the increasing and evolving threat of cyber-attacks, cybersecurity will remain a top priority in Michigan.

Investment # 9: Operational Emergency Communications

Core Capabilities:

- Operational Communications

Investment Description:

The Operational Emergency Communications investment will allow the Michigan Public Safety Communications Interoperability Board to pursue actionable and measurable goals and objectives that support our state in planning for new technologies and navigating the ever-changing emergency communications ecosystem. The Michigan Statewide Communication Interoperability Plan (SCIP) is a stakeholder-driven multi-jurisdictional and multi-disciplinary statewide strategic plan to enhance interoperable and emergency communications. The SCIP is a critical mid-range strategic planning tool to help Michigan prioritize resources, strengthen governance and planning, and address interoperability gaps. The Operational Communications gaps within Michigan include: interoperability between responders; communications between responders and the affected population; data communications; re-establishing communications infrastructure; re-establishing critical information networks; and voice communications. Communication capabilities differ across the state and Michigan recognizes that public safety communications interoperability must function as a system of systems. Therefore, Michigan developed the single statewide system known as Michigan's Public Safety Communications System (MPSCS). Activities under this investment are a priority because it supports this system and the various systems that operate within it. Interoperable communication networks are the backbone of our public safety system. It is critical that public safety stays the course and provides input to improving communication interoperability and information sharing among local, regional, state, and federal agencies.

Note: When using HSGP funding for Emergency Communications investments, be aware there are requirements that apply to all such grant-funded communications investments in support of the emergency communications priorities and best practices. For example:

- Applicants must describe in the investment how proposed communications investments align to needs identified in their SCIP.
- The signatory authority for the SAA must certify in writing to FEMA their compliance with the SAFECOM Guidance.

Please refer to p.16-17 of the FY19 HSGP Notice of Funding Opportunity (NOFO) for all Operational Communications requirements.

Appendix A: Summary of the National Preparedness Goal

The National Preparedness Goal (NPG) is “[a] secure and resilient Nation with the capabilities required across the whole community to prevent, protect against, mitigate, respond to, and recover from the threats and hazards that pose the greatest risk.” The NPG essentially defines what it means for all communities to be prepared collectively for the threats and hazards that pose the greatest risk to the nation. The NPG identifies 32 distinct activities, called core capabilities, needed to address the risks. The NPG organizes these core capabilities into five categories, called mission areas. Some core capabilities apply to more than one mission area. For example, the first three core capabilities—Planning, Public Information and Warning, and Operational Coordination—are cross-cutting capabilities, meaning they apply to each of the five mission areas. The National Preparedness Goal describes the five mission areas as follows:

Prevention

Prevention includes those capabilities necessary to avoid, prevent, or stop a threatened or actual act of terrorism. It is focused on ensuring we are optimally prepared to prevent an imminent terrorist attack within the United States. Prevention also includes the intelligence, law enforcement, and homeland defense activities conducted in the event of an act of terrorism in the homeland to determine if follow-on attacks are planned and thwart and/or apprehend the adversary.

Protection

Protection includes capabilities to safeguard the homeland against acts of terrorism and man-made or natural disasters. It is focused on actions to protect the citizens, residents, visitors, and critical assets, systems, and networks against the greatest risks to our Nation in a manner that allows our interests, aspirations, and way of life to thrive. We will create conditions for a safer, more secure, and more resilient Nation by enhancing Protection through cooperation and collaboration with all sectors of society.

Mitigation

Mitigation includes those capabilities necessary to reduce loss of life and property by lessening the impact of disasters. It is focused on the premise that individuals, the private sector, communities, critical infrastructure, and the Nation as a whole are made more resilient when the consequences and impacts, the duration, and the financial and human costs to respond to and recover from adverse incidents are all reduced.

Response

Response includes those capabilities necessary to save lives, protect property and the environment, and meet basic human needs after an incident has occurred. It is focused on ensuring that the Nation is able to effectively respond to any threat or hazard, including those with cascading effects, with an emphasis on saving and sustaining lives and stabilizing the incident, as well as rapidly meeting basic human needs, restoring basic services and community functionality, establishing a safe and secure environment, and supporting the transition to recovery.

Recovery

Recovery includes those capabilities necessary to assist communities affected by an incident in recovering effectively. It is focused on a timely restoration, strengthening, and revitalization of the infrastructure; housing; a sustainable economy; and the health, social, cultural, historic, and environmental fabric of communities affected by a catastrophic incident. The ability of a

community to accelerate the recovery process begins with its efforts in pre-disaster preparedness, including mitigation, planning, and building capacity for disaster recovery. These efforts result in a resilient community with an improved ability to withstand, respond to, and recover from disasters, which can significantly reduce recovery time and costs.

Core Capabilities by Mission Area

Prevention	Protection	Mitigation	Response	Recovery			
Planning							
Public Information and Warning							
Operational Coordination							
Intelligence and Information Sharing		Community Resilience	Infrastructure Systems				
Interdiction and Disruption			Critical Transportation	Economic Recovery			
Screening, Search and Detection					Environmental Response/Health and Safety		
Forensics and Attribution	Access Control and Identity Verification	Long-term Vulnerability Reduction				Fatality Management Services	Health and Social Services
	Cybersecurity		Risk and Disaster Resilience Assessment	Housing			
	Physical Protective Measures				Natural and Cultural Resources		
	Risk Management for Protection Programs and Activities						
	Supply Chain, Integrity and Security						
		Threats and Hazards Identification				Fire Management and Suppression*	
		Operational Communications	Public Health, Healthcare, and Emergency Medical Services				
		Situational Assessment					

Appendix B: Summary of the Core Capabilities

Access Control and Identity Verification

Apply and support necessary physical, technological, and cyber measures to control admittance to critical locations and systems.

Community Resilience

Enable the recognition, understanding, communication of, and planning for risk to empower individuals and communities to make informed risk management decisions necessary to adapt to, withstand, and quickly recover from future incidents.

Critical Transportation

Provide transportation (including infrastructure access and accessible transportation services) for response priority objectives, including the evacuation of people and animals and the delivery of vital response personnel, equipment, and services into the affected areas.

Cybersecurity

Protect (and, if needed, restore) electronic communications systems, information, and services from damage, unauthorized use, and exploitation.

Economic Recovery

Return economic and business activities (including food and agriculture) to a healthy state and develop new business and employment opportunities that result in an economically viable community.

Environmental Response/Health and Safety

Conduct appropriate measures to ensure the protection of the health and safety of the public and workers, as well as the environment, from all-hazards in support of responder operations and the affected communities.

Fatality Management Services

Provide fatality management services, including decedent remains recovery and victim identification, working with local, state, tribal, territorial, insular area, and Federal authorities to provide mortuary processes, temporary storage or permanent internment solutions, sharing information with mass care services for the purpose of reunifying family members and caregivers with missing persons/remains, and providing counseling to the bereaved.

Fire Management and Suppression

Provide structural, wildland, and specialized firefighting capabilities to manage and suppress fires of all types, kinds, and complexities while protecting the lives, property, and the environment in the affected area.

Forensics and Attribution

Conduct forensic analysis and attribute terrorist acts (including the means and methods of terrorism) to their source, to include forensic analysis as well as attribution for an attack and the preparation for an attack in an effort to prevent initial or follow-on acts, and/or swiftly develop counter-options.

Health and Social Services

Restore and improve health and social services capabilities and networks to promote the resilience, independence, health (including behavioral health), and well-being of the whole community.

Housing

Implement housing solutions that effectively support the needs of the whole community and contribute to its sustainability and resilience.

Infrastructure Systems

Stabilize critical infrastructure functions, minimize health and safety threats, and efficiently restore and revitalize systems and services to support a viable, resilient community.

Intelligence and Information Sharing

Provide timely, accurate, and actionable information resulting from the planning, direction, collection, exploitation, processing, analysis, production, dissemination, evaluation, and feedback of available information concerning physical and cyber threats to the United States, its people, property, or interests; the development, proliferation, or use of weapons of mass destruction; or any other matter bearing on U.S. national or homeland security by local, state, tribal, territorial, Federal, and other stakeholders. Information sharing is the ability to exchange intelligence, information, data, or knowledge among government or private sector entities, as appropriate.

Interdiction and Disruption

Delay, divert, intercept, halt, apprehend, or secure threats and/or hazards.

Logistics and Supply Chain Management

Deliver essential commodities, equipment, and services in support of impacted communities and survivors, to include emergency power and fuel support, as well as the coordination of access to community staples. Synchronize logistics capabilities and enable the restoration of impacted supply chains.

Long-term Vulnerability Reduction

Build and sustain resilient systems, communities, and critical infrastructure and key resources lifelines to reduce their vulnerability to natural, technological, and human-caused threats and hazards by lessening the likelihood, severity, and duration of the adverse consequences.

Mass Care Services

Provide life-sustaining and human services to the affected population, to include hydration, feeding, sheltering, temporary housing, evacuee support, reunification, and distribution of emergency supplies.

Mass Search and Rescue Operations

Deliver traditional and atypical search and rescue capabilities, including personnel, services, animals, and assets to survivors in need, with NPGNPG of saving the greatest number of endangered lives in the shortest time possible.

Natural and Cultural Resources

Protect natural and cultural resources and historic properties through appropriate planning, mitigation, response, and recovery actions to preserve, conserve, rehabilitate, and restore them consistent with post-disaster community priorities and best practices and in compliance with applicable environmental and historic preservation laws and Executive Orders.

On-scene Security, Protection, and Law Enforcement

Ensure a safe and secure environment through law enforcement and related security and protection operations for people and communities located within affected areas and also for response personnel engaged in lifesaving and life-sustaining operations.

Operational Communications

Ensure the capacity for timely communications in support of security, situational awareness, and operations by any and all means available, among and between affected communities in the impacted area and all response forces.

Operational Coordination

Establish and maintain a unified and coordinated operational structure and process that appropriately integrates all critical stakeholders and supports the execution of core capabilities.

Physical Protective Measures

Implement and maintain risk-informed countermeasures and policies protecting people, borders, structures, materials, products, and systems associated with key operational activities and critical infrastructure sectors.

Planning

Conduct a systematic process engaging the whole community as appropriate in the development of executable strategic, operational, and/or tactical level approaches to meet defined objectives.

Public Health, Healthcare, and Emergency Medical Services

Provide lifesaving medical treatment via Emergency Medical Services and related operations and avoid additional disease and injury by providing targeted public health, medical, and behavioral health support and products to all affected populations.

Public Information and Warning

Deliver coordinated, prompt, reliable, and actionable information to the whole community through the use of clear, consistent, accessible, and culturally and linguistically appropriate methods to effectively relay information regarding any threat or hazard, as well as the actions being taken and the assistance being made available, as appropriate.

Risk and Disaster Resilience Assessment

Assess risk and disaster resilience so that decision makers, responders, and community members can take informed action to reduce their entity's risk and increase their resilience.

Risk Management for Protection Programs and Activities

Identify, assess, and prioritize risks to inform Protection activities, countermeasures, and investments.

Screening, Search, and Detection

Identify, discover, or locate threats and/or hazards through active and passive surveillance and search procedures. This may include the use of systematic examinations and assessments, bio-surveillance, sensor technologies, or physical investigation and intelligence.

Situational Assessment

Provide all decision makers with decision-relevant information regarding the nature and extent of the hazard, any cascading effects, and the status of the response.

Supply Chain Integrity and Security

Strengthen the security and resilience of the supply chain.

Threats and Hazards Identification

Identify the threats and hazards that occur in the geographic area; determine the frequency and magnitude; and incorporate this into analysis and planning processes so as to clearly understand the needs of a community or entity.

Appendix C: Stakeholder Preparedness Review Functional Gaps

Note: FY 2019 HSGP was developed using the 2018 SPR which only assessed the core capabilities in the Response and Recovery mission areas. Capabilities marked with an * asterisk were not assessed in the 2018 SPR. Functional gaps for these capabilities are from the 2017 State Preparedness Report.

Function Gaps by Core Capability:

Planning

- Evaluating and updating plans
- Operational planning
- Whole community involvement and coordination
- Continuity planning
- Including individuals with disabilities or access/ functional needs
- Incorporating risk analyses
- Integrating different plans
- Pre-incident planning
- Strategic planning

Public Information and Warning

- Evaluating and updating plans
- Operational planning
- Whole community involvement and coordination
- Continuity planning
- Including individuals with disabilities or access/ functional needs
- Incorporating risk analyses
- Integrating different plans
- Pre-incident planning
- Strategic planning

Operational Coordination

- Command, control, and coordination (sustainment only)
- NIMS/ICS compliance (sustainment only)
- Stakeholder engagement (sustainment only)
- Allocating and mobilizing resources
- Determining priorities, objectives, strategies
- Emergency Operations Center management
- Ensuring information flow
- Ensuring unity of effort
- Ensuring continuity of government and essential services
- Establishing a common operating picture
- Establishing lines of communication
- Establishing roles and responsibilities

***Forensics and Attribution**

- Assessing terrorist capabilities
- CBRNE material analysis
- Crime scene preservation and exploitation
- Evidence collection

***Intelligence and Information Sharing**

- Establishing intelligence and information requirements
- Analysis of intelligence and information
- Continuous threat assessment
- Safeguarding sensitive information
- Developing reports and products
- Disseminating intelligence and information
- Exploiting and processing information
- Feedback and evaluation
- Gathering intelligence
- Monitoring information

***Interdiction and Disruption**

- Anti-terrorism operations
- Border security
- CBRNE detection
- CBRNE render safe
- Deterrent law enforcement presence
- Tactical law enforcement operations
- Tracking and targeting terrorists and their weapons
- Wide area search and detection
- Interdicting cargo, conveyances, and persons
- Financial disruption
- Preventing acquisition of CBRNE

***Screening, Search, and Detection**

- Electronic search
- Explosives detection
- Locating terrorists
- Physical investigation
- Wide area search
- Promoting an observant nation
- Radiological and nuclear detection
- Screening
- Bio-surveillance
- Chemical and biological detection
- Laboratory testing

***Access Control and Identity Verification**

- Controlling cyber access
- Controlling physical access
- Verifying identity

***Cybersecurity**

- Controlling electronic access
- Guidelines, regulations, and standards
- Protective measures
- Detecting malicious activity
- Securing CIKR and Supervisory Control and Data Acquisition systems
- Sharing threat information
- Technical countermeasures
- Continuity of operations for cyber systems
- Investigating malicious actors
- End user awareness

***Physical Protective Measures**

- Biosecurity
- Border protection
- Identifying and prioritizing assets to protect
- Site-specific and process-specific risk assessments
- Physical Security Measures

***Risk Management for Protection Programs and Activities**

- Analysis tools
- Data Collection
- Incorporating risk assessments in exercise design
- Risk assessment
- Risk Communication
- Risk management planning

***Supply Chain Integrity and Security**

- Analysis of supply chain dependencies
- Implementing countermeasures
- Implementing physical protection
- Integrating security processes
- Verification and detection

***Community Resilience**

- Communication and outreach
- Education and skill building

- Understanding the community
- Collaborative planning and decision-making
- Partnership building

***Long-term Vulnerability Reduction**

- Broadening the use of insurance
- Incorporating mitigation measures into construction and development
- Individual and family preparedness
- Adopting vulnerability reduction standards and building codes
- Developing neighborhood civic organizations

***Risk and Disaster Resilience Assessment**

- Modeling and analysis
- Education and training
- Obtaining and sharing data

***Threats and Hazards Identification**

- Data collection and sharing
- Estimating frequency and magnitude
- Modeling and analysis
- Stakeholder collaboration/coordination

Critical Transportation

- Debris Removal (sustainment only)
- Establishing Access (sustainment only)
- Evacuation
- Airspace Management
- Delivery of Response Assets
- Reentering Affected Area
- Transportation Safety and Condition Assessments

Environmental Response/Health and Safety

- Hazardous Material Clean-Up
- Decontamination
- Debris Removal
- Environmental Impact Analysis
- Health and Safety Monitoring and Assessment
- Predictive Modeling
- Responder Safety
- Survivor Safety and Assistance

Fatality Management Services

- Body Recovery (sustainment only)
- Mortuary Services (sustainment only)
- Victim Identification (sustainment only)
- Bereavement Counseling
- Family Reunification

Fire Management and Suppression

- Structural Firefighting (sustainment only)
- Extended Attack Firefighting
- Initial Attack Firefighting
- Specialized Firefighting
- Wildland Firefighting

Logistics and Supply Chain Management

- Resource Delivery (sustainment only)
- Resource Management (sustainment only)
- Access to Community Staples
- Donation Management
- Emergency Power Provision
- Fuel Support
- Private Resources
- Resource Tracking
- Supply Chain Restoration
- Volunteer Management

Mass Care Services

- Ensuring Access
- Feeding
- Hydration
- Pets
- Relocation Assistance
- Resource Distribution
- Sheltering
- Family Reunification

Mass Search and Rescue Operations

- Community-Based Search and Rescue Support
- Rescue Operations
- Search Operations
- Specialized Operations
- Synchronizing Operations

On-scene Security, Protection, and Law Enforcement

- Law Enforcement (sustainment only)
- Protecting Response Personnel (sustainment only)
- Securing Disaster Areas (sustainment only)

Operational Communications

- Interoperable Communications Between Responders
- Communication Between Responders and the Affected Population
- Data Communications
- Re-Establishing Communications Infrastructure
- Re-Establishing Critical Information Networks
- Voice Communications

Public Health, Healthcare, and Emergency Medical Services

- Definitive Care (sustainment only)
- Emergency Medical Services (sustainment only)
- Triage and Initial Stabilization (sustainment only)
- Clinical Laboratory Testing
- Health Assessments
- Medical Countermeasures
- Medical Surge
- Public Health Interventions

Situational Assessment

- Delivering Situation Reports (sustainment only)
- Stakeholder Engagement (sustainment only)
- Analyzing Information
- Assessing Hazard Impacts
- Tracking Response Activities

Infrastructure Systems

- Communications Systems
- Power Restoration
- Sanitation
- Water Treatment and Provision
- Dams and Flood Control
- Food Production and Delivery
- Government Facilities
- Heating Fuel Provision
- Hospitals
- Infrastructure Site Assessments

Economic Recovery

- Reopening Businesses
- Business/Economic Continuity Planning
- Developing Recovery Objectives
- Developing the Workforce
- Disseminating Information
- Economic Impact Assessments
- Incentivizing Entrepreneurial and Business Development
- Management Planning

Health and Social Services

- Healthcare Facilities and Coalitions (sustainment only)
- Social Services (sustainment only)
- Behavioral Health
- Determining Health and Social Needs
- Ensuring Access
- Environmental Health
- Food Safety
- Health Assessment
- Medical Products and Services
- Public Awareness
- Public Health Measures
- Response and Recovery Worker Health
- School Impacts

Housing

- Addressing Housing Shortages (sustainment only)
- Housing Accessibility (sustainment only)
- Transition from Interim to Permanent/Long-Term Housing (sustainment only)
- Housing Affordability
- Housing Assessments
- Reconstruction of Destroyed Housing
- Rehabilitation of Damaged Housing

Natural and Cultural

- Damage Assessment
- Environmental Preservation and Restoration
- Historic Preservation

Appendix D: FY 2019 Programs - Allowable Program Activities

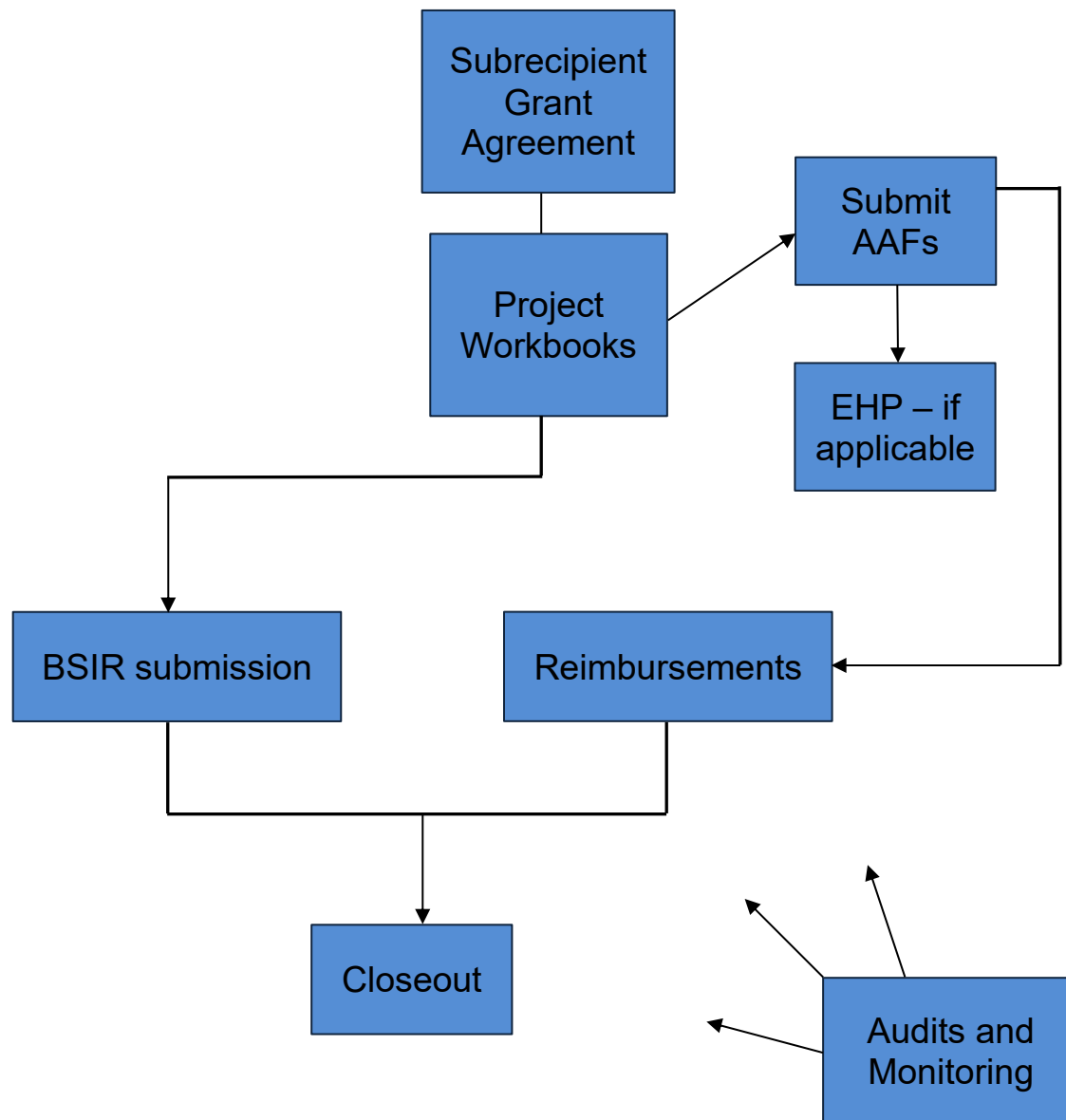
Allowable Program Activities Current as of FY 2019 Programs This list is not all-inclusive. See the respective program guidance for additional details and/or requirements	SHSP	UASI	OPSG
Allowable Planning Costs			
Developing hazard/threat-specific annexes	Y	Y	N
Developing and implementing homeland security support programs and adopting ongoing FEMA national initiatives	Y	Y	N
Developing related terrorism and other catastrophic event prevention activities	Y	Y	N
Developing and enhancing plans and protocols	Y	Y	N
Developing or conducting assessments	Y	Y	N
Hiring of full- or part-time staff or contract/consultants to assist with planning activities	Y	Y	N
Materials required to conduct planning activities	Y	Y	N
Travel/per diem related to planning activities	Y	Y	Y
Overtime and backfill costs (in accordance with operational Cost Guidance)	Y	Y	Y
Issuance of WHTI-compliant Tribal identification cards	Y	N	N
Activities to achieve planning inclusive of people with disabilities and others with access and functional needs and limited English proficiency.	Y	Y	N
Coordination with Citizen Corps Councils for public information/education and development of volunteer programs	Y	Y	N
Update governance structures and processes and plans for emergency communications	Y	Y	N
Development, and review and revision of continuity of operations plans	Y	Y	N
Development, and review and revision of the THIRA/SPR continuity of operations plans	Y	Y	N
Allowable Organizational Activities Note: Personnel hiring, overtime, and backfill expenses are permitted under this grant only to the extent that such expenses are for the allowable activities within the scope of the grant.			
Program management	Y	Y	N
Development of whole community partnerships	Y	Y	N
Structures and mechanisms for information sharing between the public and private sector	Y	Y	N
Implementing models, programs, and workforce enhancement initiatives	Y	Y	N
Tools, resources, and activities that facilitate shared situational awareness between the public and private sectors	Y	Y	N
Operational support	Y	Y	N
Utilization of standardized resource management concepts	Y	Y	N
Responding to an increase in the threat level under the National Terrorism Advisory System (NTAS), or needs in resulting from a National Special Security Event	Y	Y	N
Reimbursement for select operational expenses associated with increased security measures at critical infrastructure sites incurred (up to 50 percent of the allocation)	Y	Y	Y
Overtime for information, investigative, and intelligence sharing activities (up to 50 percent of the allocation)	Y	Y	Y

Hiring of new staff positions/contractors/consultants for participation in information/intelligence analysis and sharing groups or fusion center activities (up to 50 percent of the allocation).	Y	Y	N
Allowable Equipment Categories			
Personal Protective Equipment	Y	Y	Y
Explosive Device Mitigation and Remediation Equipment	Y	Y	N
CBRNE Operational Search and Rescue Equipment	Y	Y	N
Information Technology	Y	Y	Y
Cybersecurity Enhancement Equipment	Y	Y	N
Interoperable Communications Equipment	Y	Y	Y
Detection	Y	Y	Y
Decontamination	Y	Y	N
Medical countermeasures	Y	Y	Y
Power (e.g., generators, batteries, power cells)	Y	Y	Y
CBRNE Reference Materials	Y	Y	N
CBRNE Incident Response Vehicles	Y	Y	N
Terrorism Incident Prevention Equipment	Y	Y	Y
Physical Security Enhancement Equipment	Y	Y	Y
Inspection and Screening Systems	Y	Y	Y
Animal Care and Foreign Animal Disease	Y	Y	N
CBRNE Prevention and Response Watercraft	Y	Y	N
CBRNE Prevention and Response Unmanned Aircraft	Y	Y	N
CBRNE Aviation Equipment	Y	Y	N
CBRNE Logistical Support Equipment	Y	Y	N
Intervention Equipment (e.g., tactical entry, crime scene processing)	Y	Y	Y
Critical emergency supplies	Y	Y	N
Vehicle rentals	N	N	Y
Other Authorized Equipment	Y	Y	Y
Allowable Training Costs			
Overtime and backfill for emergency preparedness and response personnel attending DHS/FEMA-sponsored and approved training classes	Y	Y	Y
Overtime and backfill expenses for part-time and volunteer emergency response personnel participating in DHS/FEMA training	Y	Y	Y
Training workshops and conferences	Y	Y	Y
Activities to achieve training inclusive of people with disabilities and others with access and functional needs and limited English proficiency	Y	Y	N
Full- or part-time staff or contractors/consultants	Y	Y	Y
Travel	Y	Y	Y
Supplies	Y	Y	N
Instructor certification/re-certification	Y	Y	N
Coordination with Citizen Corps Councils in conducting training exercises	Y	Y	N
Interoperable communications training	Y	Y	N
Activities to achieve planning inclusive of people with limited English proficiency	Y	Y	N
Immigration enforcement training	Y	Y	Y
Allowable Exercise Related Costs			
Design, Develop, Conduct, and Evaluate an Exercise	Y	Y	N
Full- or part-time staff or contractors/consultants	Y	Y	N
Overtime and backfill costs, including expenses for part-time and volunteer emergency response personnel participating in DHS/FEMA exercises	Y	Y	N
Implementation of HSEEP	Y	Y	N
Activities to achieve exercises inclusive of people with disabilities and others with access and functional needs	Y	Y	N
Travel	Y	Y	N
Supplies	Y	Y	N

Interoperable communications exercises	Y	Y	N
Allowable Exercise Related Costs			
Activities to achieve planning inclusive of people with limited English proficiency	Y	Y	N
Allowable Management and Administrative Costs			
Hiring of full- or part-time staff or contractors/consultants to assist with the management of the respective grant program, application requirements, and compliance with reporting and data collection requirements	Y	Y	Y
Development of operating plans for information collection and processing necessary to respond to DHS/FEMA data calls	Y	Y	Y
Overtime and backfill costs	Y	Y	Y
Travel	Y	Y	Y
Meeting related expenses	Y	Y	Y
Authorized office equipment	Y	Y	N
Recurring expenses such as those associated with cell phones and faxes during the PoP of the grant program	Y	Y	N
Leasing or renting of space for newly hired personnel during the PoP of the grant program	Y	Y	N
Law Enforcement Terrorism Prevention Activities (LETPA) Costs			
Maturation and enhancement of designated state and major Urban Area fusion centers	Y	Y	N
Coordination between fusion centers and other analytical and investigative efforts	Y	Y	N
Implementation and maintenance of the Nationwide SAR Initiative	Y	Y	N
Implementation of the "If You See Something, Say Something [®] " campaign	Y	Y	N
Increase physical security, through law enforcement personnel and other protective measures, by implementing preventive and protective measures at critical	Y	Y	N
Building and sustaining preventive radiological and nuclear detection capabilities	Y	Y	N

Appendix E: Subrecipient Administrative Process

This appendix is provided as a quick overview of the administrative processes and requirements of subrecipient HSGP grant awards. This is not an exhaustive inventory of all potential HSGP administrative requirements, and some projects may include additional evaluation or reporting requirements.



Appendix F: FY 2019 HSGP Project Workbook Checklist

Checking the following steps before the submission deadline will help ensure that projects pass federal review.

Workbook Checkpoints

- I. Project Fields
- II. Alignment
- III. Project Descriptions
- IV. Shareable or Deployable
- V. Funding
- VI. LETPA
- VII. Milestones
- VIII. Sustain/NIMS/Construction

Tab A

- ☐ **I:** All project fields are complete. (Example: Subrecipient Name, Zip Code...)
- ☐ **II:** Is most appropriate core capability selected?
- ☐ **II:** Is project aligned to correct investment as determined by core capability?
- ☐ **III:** Is adequate detail provided?
- ☐ **III:** Are specific core capability gaps identified?
- ☐ **III:** Does project description support funding request?
- ☐ **III:** Check Core Capability with Investment. (Example: SHSP-5 -CBRNE Response Capabilities / Mass Search and Rescue Operations)
- ☐ **III.:** Ensure Core Capability is within Project Description and specific gaps are identified. (Example: Provide power restoration systems to government facilities, public safety facilities, and shelters. This project supports the infrastructure Systems core capability in the following functional areas identified in the SPR: communications systems, government facilities, power restoration, and public safety facilities.
- ☐ **III:** Check if Project Description aligns with Investment which will be determined by the Core Capability.
 - ☐ *M&A project included.*

IV: Check if Shareable and Deployable responses are accurate.

- ☐ **Shareable**
Provides information on the utility of a non-deployable shared asset in a region; identifies the asset's ability to augment and sustain a reinforced response within a region. An asset that can be utilized as a local, state, regional, or national capability, but is not physically deployable (i.e. fusion centers).

OR (*Can be neither but **cannot** be both*)

- ☐ **Deployable**
Identifies the availability and utility of an asset to multiple jurisdictions, regions, and the Nation; provides information on mobility of assets in an area. An asset that is physically mobile and can be used anywhere in the United State and territories via EMAC or other mutual aid/assistance agreements.
- ☐ **V:** Check that Investment is aligned with appropriate funding source.
- ☐ **V:** Ensure allocation of Solution Areas fits within Project Description. (Example: Planning for a conference should have allocation of funds in Planning).
- ☐ **VI:** Does the Regional Grant total allocation have 25% of funding dedicated towards LETPA?
- ☐ **VI:** If project includes LETPA, ensure project capabilities are allowable LETPA activities.
All Core capabilities under the Prevention and Protection Mission Area are LETPA-eligible and some core capabilities under other Mission Areas are possible.
- ☐ **VII:** Milestones should include more than one and must cover the entire implementation of the project to be funded with the applicable grant year funds.
- ☐ **VII:** Can the project be completed within the period of performance?

Tab B

- ☐ **VIII:** If the project is sustainment, make sure the column, "Last completed milestone of the previous investment" is completed with previous investment information pertaining to that project.
- ☐ **VIII:** Ensure NIMS fields are completed if the project supports a NIMS capability.
- ☐ **VIII:** Verify Construction Activity with Project Description.

References

Building Capability/Sustaining Capability

Building refers to activities that start a new capability or increase a capability. Sustaining refers to activities that maintain a capability at its current level. This project attribute contributes to the risk and gap analysis of the applicant and the Federal reviewers. It will assist FEMA in measuring progress towards the National Preparedness Goal.

Resource Typing

As part of the description for each project, the applicant must identify whether the project supports a NIMS-typed resource. Applicants should refer to the Resource Typing Library Tool located at <http://www.fema.gov/resource-management> to select specific typed resources. Resource typing is categorizing, by capability, the resources requested, deployed, and used in incidents. Measurable standards identifying resource capabilities and performance levels serve as the basis for categories. Resource users at all levels use these standards to identify and inventory resources. Resource kinds may be divided into subcategories to define more precisely the capabilities needed to meet specific requirements.

Appendix G: FY 2019 Homeland Security Grant Program Document Submission Checklist

- ☐ **Fiscal Year (FY) 2019 SHSP/UASI Grant Agreement– November 29, 2019 (varies for each year).** Return the following documents: one signed grant agreement; Subrecipient Risk Assessment Certification; Standard Assurances; Certifications Regarding Lobbying, Debarment, Suspension and Other Responsibility Matters; Audit Certification; and Taxpayer Identification Number and Certification (W-9).
- ☐ **FY 2019 SHSP/UASI Project Workbooks –January 10, 2020.** Project Workbooks must be updated with actual FY 2019 funding levels for submission in the federal Grants Reporting Tool.
- ☐ **Biannual Strategy Implementation Report (BSIR) – January 10th and July 10th every year.** The BSIR is a federal reporting requirement that must account for all grant funds and provide an update on the progress of your projects. The submission is due on Jan 10th and should reflect activities between July 1-December 31 of the previous year. The July 10th report should reflect activities from January 1 to June 30th.
- ☐ **Project workbooks – January 10th and July 10th every year.** An updated project workbook must be submitted with each BSIR submission.
- ☐ **Fiduciary Identification - July 31, 2020 –** The FY 2020 HSGP regional fiduciary must be identified and submitted to MSP/EMHSD.
- ☐ **Alignment and Allowability Forms (AAF's) - Ongoing as needed throughout grant.** The AAF must align to a project included in the project workbook. Cost eligibility determination is based on information provided in the AAF, including the intended use/outcome of the project, and assessed against grant program guidance.
- ☐ **Environmental and Historic Prevention (EHP) Screening Form – After AAF review.** An EHP must be approved by FEMA before a project can start. Notice will be sent by MSP/EMHSD with the AAF if an EHP is required. The AAF approval is conditional upon completing an EHP and receiving FEMA approval.
 - Projects that have the potential to impact the environment or historical integrity of a building or community must participate in the EHP review process. The projects may include construction, installation, modification, or renovation of existing buildings, structures, and facilities; or new construction including replacement of facilities.
- ☐ **Reimbursements - No later than 30 days after following the end of the subrecipient period of performance.** Must include Reimbursement cover sheet (EMD-054), approved AAF with page 5 completed; proof of payment; and paid invoice; EHP

approval, EMD-056 Equipment, Supplies and Other Items Reimbursement Detail, or EMD-055 Payroll Reimbursement Detail, as applicable.

- ☐ **Personnel Certifications – Nov. 1st and April 30th (every year).** All HSGP funded personnel (M&A included) are required to have a current personnel certification form on file.
- ☐ **Nationwide Cybersecurity Review - February 14, 2020** The Nationwide Cybersecurity Review is a no-cost, anonymous, annual self-assessment designed to measure gaps and capabilities of state, local, tribal and territorial governments' cybersecurity programs. All HSGP subrecipients must participate in the survey.
- ☐ **Equipment Inventory List - 30 days after the end of the subrecipient's fiscal year.** If equipment is purchased, as defined by 2 CFR 200, it must be maintained in an equipment inventory list that includes specific information outlined in 2 CFR 200.313. The equipment inventory list must be submitted to MSP/EMHSD annually.
- ☐ **Grant Files – 3 years after grant closeout.** Subrecipients must maintain all grant documentation for three years following the closeout of the grant year. Records must be available upon request for state or federal audit.
- ☐ **Equipment Records – 3 years after disposition.** Subrecipients must maintain all equipment documentation for three years following disposition of the equipment. Records must be available upon request for state or federal audit.

Appendix H: Audit Topics from 2 CFR 200

As the SAA for the U.S. Department of Homeland Security grant programs, the MSP/EMHSD is responsible for ensuring that all subrecipients adhere to requirements established by the Federal government. In doing so, the MSP/EMHSD monitors grant compliance and provides guidance on how to best meet Federal requirements. Subrecipients are encouraged to contact their agency's legal staff for assistance in determining compliance with the Federal grant and Code of Federal Regulations (CFR) requirements.

To assist in subrecipient understanding of some of the 2 CFR 200 requirements, the following is a summary of the required contract provisions and examples of common audit findings, excerpts from the 2 CFR 200 citation(s) related to those findings, and suggested actions that support compliance. To review the complete 2 CFR 200 citation, go to www.ecfr.gov; select Title 2; under Subtitle A, click 200-299; select the specific citation you want to review. The term "subrecipient" includes employees of the subrecipient, members of their governing board, or fiduciary agents.

These are the topics included in this appendix:

- Contract Provision Requirements
- Socio-Economic Procurement
- Sole Source Procurement
- Dual Compensation
- Conflict of Interest
- Suspension and Debarment
- Equipment Procedures
- Professional Services of an Officer or Employee of a Non-Federal Entity
- Standards for Documentation of Personnel Expenses
- Subrecipient Monitoring and the Single Audit Requirement
- Subrecipient Policies and Procedures

Contract Provision Requirements of 2 CFR 200 and Appendix II

Subrecipients must develop contract provisions to be included with all contracts, quotes, or purchase orders. The required provisions are summarized below. A separate 2 CFR 200 Procurement Procedures manual, which will include the FEMA Contract Provisions Template, will be provided at a later date and will outline and explain all procurement requirements. This section is intended to familiarize the subrecipient with the contract provision requirements. If you would like a copy of the FEMA Contract Provisions Template, or have any questions concerning 2 CFR 200 requirements please contact the Audit Unit. Contact information is in Appendix K – MSP/EMHAD Points of Contact of this document.

Outline of the FEMA Contract Provisions Template

PROVISIONS IN 2 CFR 200 APPENDIX II

1. Legal, Contractual, and Administrative remedies for breach of contract; required for contracts greater than the Simplified Acquisition Threshold, currently \$250,000. This provision is based on your organization's policy. We suggest your attorney draft this clause if it pertains to your procurement.

2. Termination for cause or convenience; required for contracts greater than \$10,000. This provision also is based on your organization's policy. We suggest your attorney draft this clause if your procurement is greater than \$10,000.
3. Equal Employment Opportunity; required for all construction contracts¹.
4. Davis Bacon Act; required for all construction contracts¹.
5. Copeland Anti-Kickback Act; required for all construction contracts¹ where the Davis Bacon Act applies.
6. Contract Work Hours and Safety Standards Act; required for contracts greater than \$100,000 that involve employment of mechanics or laborers.
7. Rights to Inventions Made Under a Contract or Agreement; required for "funding agreements" and pertains to grants funding intellectual property and inventions.
8. Clean Air Act and Federal Water Pollution Control Act; required for contracts greater than \$150,000.
9. Debarment and Suspension; required for all contracts and purchase agreements
10. Byrd Anti-Lobbying Amendment (identified as #9 in the template); required for contracts of \$100,000 or greater; a certification is required.
11. Procurement of Recovered Materials (identified as #10 in the template); required for states and political subdivisions. Requires procuring only items that contain the highest percentage of recovered materials practicable when the purchase price exceeds \$10,000. Other requirements are also listed.

ADDITIONAL PROVISIONS REQUIRED BY FEMA

1. Access to Records; a clause requiring access to records is required for all contracts and purchase agreements.
2. Changes; a clause describing how cost changes, modifications, change orders, or constructive changes will be enacted; recommended for all contracts and purchase agreements.
3. DHS Seal, Logo, and Flags; a clause requiring obtaining permission prior to use, recommended for all contracts and purchase agreements.
4. Compliance with Federal Law, Regulations and Executive Orders; a clause requiring compliance of Federal laws, regulations, and Executive Orders; recommended for all contracts and purchase agreements.
5. No Obligation by Federal Government; a clause stating that the Federal government is not a party to the contract; recommended for all contracts and purchase agreements.

¹ MSP/EMHSD defines construction as any project greater than \$2,000 that requires an EHP review.

6. Program Fraud and False or Fraudulent Statements or Related Acts; a clause stating the contractor will comply with The False Claims Act; recommended for all contracts and purchase agreements.

Socio-Economic Procurement

Situation: When procuring goods and services, subrecipients do not seek out and include businesses from the socio-economic groups when obtaining quotes; or in their solicitation for bids (whether formal or informal); and/or their search criteria is geographically limiting (for example, searching within a 100-mile radius of the subrecipient municipality) and no socio-economic firms were identified in that geographic area. A socio-economic business is one that is a small or minority-owned business, women-owned business enterprise, or disadvantaged (labor surplus area) business.

Requirement:

2 CFR 200.321

- (a) The non-Federal entity must take all necessary affirmative steps to assure that minority businesses, women's business enterprises, and labor surplus area firms are used when possible.
- (b) Affirmative steps must include:
 - (1) Placing qualified small and minority businesses and women's business enterprises on solicitation lists;
 - (2) Assuring that small and minority businesses and women's business enterprises are solicited whenever they are potential sources;
 - (3) Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses and women's business enterprises;
 - (4) Establishing delivery schedules, where the requirement permits, which encourages participation by small and minority businesses and women's business enterprises;
 - (5) Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce; and
 - (6) Requiring the prime contractor, if subcontracts are to be let, to take the affirmative steps listed in paragraphs (1) through (5) of this section.

2 CFR 200.319 (b)

The non-Federal entity must conduct procurements in a manner that prohibits the use of statutorily or administratively imposed State, Local, or Tribal geographical preferences in the evaluation of bids or proposals, except in those cases where applicable Federal statutes expressly mandate or encourage geographic preference. Nothing in this section preempts state licensing laws. When contracting for architectural and engineering services, geographic location may be a selection criterion provided its application leaves an appropriate number of qualified firms, given the nature and size of the project, to compete for the contract.

Suggestion: The Small Business Association has developed a tool to assist in locating socio-economic businesses to include in procurements called the Dynamic Small Business Search. The tool is found at: http://dsbs.sba.gov/dsbs/search/dsp_dsbs.cfm.

It is important that your search criteria are broad enough that at least one socio-economic firm is identified. If you have concerns based on the distance of the firm's location to you, perhaps that their response time would be problematic, include those requirements in your solicitation. It is up to the firm to decide if they can meet the criteria. In order to comply with both 2 CFR 200.321 and 2 CFR 200.319 (b), you must ensure your search is broad enough to include at least one socio-economic firm without regard to the distance from your location.

Sole Source Procurement

Situation: Subrecipients do not publicly solicit for quotes or bids when procuring goods and services and do not actively seek out socio-economic businesses. Noncompetitive proposals (sole source selection) for goods and services are generally not allowed.

Subrecipients cannot select a vendor from a "preferred" vendor list to bypass the competitive quote/bid process. Preferred vendor lists are allowed as a pool of vendors from which to solicit, but subrecipients must also solicit from the general public. Soliciting from socio-economic firms is required. Procurement policies that limit competition like "Buying Local" are not allowed. Subrecipients must follow applicable Federal, state, and local procurement procedures.

Requirements:

2 CFR 200.320 (f) (1-4)

Procurement by noncompetitive proposals is procurement through the solicitation of a proposal from only one source and may be used only when one or more of the following circumstances apply:

- The item is available only from a single source;
- The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation (*not allowed under the HSGP*);
- The Federal awarding agency or pass-through entity expressly authorizes a non-competitive proposal in response to a written request from a recipient or subrecipient; or
- After solicitation of a number of sources, competition is determined inadequate.

Suggestion: The procurement of goods or services by noncompetitive proposals (sole source) as allowed by the HSGP grant may be done only when the circumstances of 2 CFR 200.320 (f)(1) or (4) (listed above) are present. Identifying and including socio-economic firms in the solicitation process is required. If the subrecipient believes they meet the criteria for non-competitive procurement, they must document that justification thoroughly. The documentation must include the following:

- Brief description of the product or service being procured;
- Detailed explanation why a noncompetitive procurement is necessary, including
 - Length of the contract for the defined scope of work;
 - Statement of impact on the scope of work if a noncompetitive contract is not used
- Steps taken to determine full and open competition cannot be used, describing the research conducted to determine no other resources are available to meet the contract provisions

- Describe known conflicts of interest and efforts made to identify possible conflicts of interest. If no efforts were taken, explain why.
- Include all other information justifying the use of noncompetitive procurement.
- A separate narrative must be prepared for each noncompetitive procurement

Preferred vendor policies or procedures are not recognized in the CFR; therefore, subrecipients may not choose vendors solely through the use of those policies to the exclusion of public solicitation. Additionally, there can be no competitive restrictions in the process such as choosing from a geographic area. The subrecipient must follow Federal, state, and local procurement procedures, and their contractors, subcontractors or subrecipients must also follow them.

Dual Compensation

Situation: Employees of a subrecipient that are paid from a Federal award perform professional services for compensation outside of their regular employment or board duties during normal work hours or while on paid leave (annual leave, sick leave, or other paid leave).

Requirement:

5 U.S. Code §5533 and Federal Grant Guidance

In no case is dual compensation allowable. That is, an employee of a unit of government (whether federal, state, or local) may not receive compensation from their unit or agency of government AND from another Federal award for a single period of time (for example, 1:00 PM to 5:00 PM), even though such work may benefit both activities. (Sick and vacation time is also considered compensated time)

Suggestion: The situation described above constitutes dual compensation. Employees who work for Federal, state, or local agencies are funded with taxpayer dollars. Employees whose wages and salaries are derived from taxpayer funds cannot be paid for work performed while they are receiving other taxpayer-funded pay. (This does not apply to subrecipient employees whose salaries and wages are derived from private sector funds.)

The subrecipient should have a Disclosure of Conflict of Interest policy. They must also ensure, through policies and procedures, that employees performing work outside of their organizational employment (whether employee or board member) are not working during any period (including leave or sick time) that is compensated by a Federal award.

All of the subrecipient's employees must have detailed documentation that includes dates and times of all work performed, including non-grant activities. (See "Standards for Documentation of Personnel Expenses" below) Employees or members of the governing board cannot be paid using grant funds when they are also receiving payment for vacation, sick leave, or any other form of paid time off.

Conflict of Interest

Situation: An employee, member, or agent of a subrecipient (including their board members), participate in making decisions, approvals, disapprovals, recommendations, or rendering of advice on the use of Federal grant money where they personally benefit from that participation, or there is the perception that they would personally benefit.

Requirement:

2 CFR 200.318 (c)(1)

Non-Federal entities must maintain written standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award, and administration of contracts. No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest. Such a conflict would arise when the employee, officer, agent, any member of his or her immediate family, his or her partner, or an organization which employs, or is about to employ, any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract. The officers, employees, and agents on the non-Federal entity may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to a subcontract...

Suggestions: The above-stated situation represents a conflict of interest. The individuals or entities that would benefit or appear to benefit from participation in any step of the procurement process, including supervision, must be excluded from all participation.

Subrecipients should have a policy or procedure regarding conflict of interest. Subrecipients must ensure that personnel receive training that illustrates what a conflict of interest looks like and explains the organization's conflict of interest procedures. Subrecipients must ensure that personnel and procurement policies are followed, and personnel that have supplemental employment or financial interest in decisions made do not participate in the process.

Subrecipients should actively perform contract monitoring to ensure that procurement decisions are not conducted with a conflict of interest.

Suspension and Debarment

Situation: The subrecipient has not verified contractors and vendors are not suspended or debarred, and/or has not maintained documentation of the verification for a proposed contractor or vendor for a contract greater than \$10,000. And/or the subrecipient has not verified suspension or debarment for a sub-award/subrecipient.

Requirements:

2 CFR 200.205 (d)

...the Federal awarding agency must comply with the guidelines on government-wide suspension and debarment in 2 CFR 180, and must require recipients and subrecipients to comply with these provisions. These provisions restrict Federal awards, subawards, and contracts with certain parties that are debarred, suspended or otherwise excluded from or ineligible for participation in Federal programs or activities.

2 CFR 200, Appendix II (H)

A contract award (see 2 CFR 180.220) must not be made to parties listed on the government-wide exclusions in the System for Award Management, in accordance with the OMB guidelines at 2 CFR 180 that implement Executive Orders 12549... and 12689..., "Debarment and Suspension." Exclusions contain the names of parties debarred, suspended, or otherwise excluded by agencies, as well as parties declared ineligible under statutory or regulatory authority other than Executive Order 12549.

Suggestions: The System for Award Management (found at <http://www.SAM.gov>), includes a searchable database maintained by the General Services Administration on parties that are excluded from receiving Federal contracts, certain subcontracts, and certain Federal financial

and nonfinancial assistance and benefits. The subrecipient must maintain evidence that their contractors or vendors have not been flagged in this system. To perform the search, follow these steps:

- Go to website www.SAM.gov and click “Search Records”
- Click “ADVANCED SEARCH – EXCLUSION” at the lower right part of the screen
- Click “Single Search”
- Enter the name of the vendor in the “Name” box, and double check the following selections
 - Classification – all
 - Exclusion – active
 - Exclusion Type – all
 - Exclusion – all
 - Perform a screen print to capture your selection criteria
- Click the blue “SEARCH” button
- Perform a screen print of results, attach to previous screen print, and maintain in your procurement file

Equipment Procedures

Situation: The subrecipient is not maintaining adequate property records and/or has not conducted and documented a physical inventory of equipment within the past two years.

Requirements:

2 CFR 200.313 (d) (1)

Property records must be maintained that include a description of the property, a serial number or other identification number, the source of funding for the property (including the FAIN), who holds title, the acquisition date, cost of the property, percentage of Federal participation in the project costs for the Federal award under which the property was acquired, the location, use, the condition of the property, and any ultimate disposition data including the date of disposition and sale price of the property.

2 CFR 200.313 (d) (2)

A physical inventory of the property must be taken, and the results reconciled with the property records at least once every two years.

Suggestion: The subrecipient prepare an equipment inventory list that includes all information required by 2 CFR 200.313 (d) (1). There is no required format as long as the required information is listed. The MSP/EMHSD has developed a template that can be used to facilitate the process, but it is not required. Additionally, the subrecipient must perform a physical inventory at least every two years, maintain the verification documentation, and submit a copy to the MSP/EMHSD Audit Unit within 30 days of their year-end.

Professional Services of an Officer or Employee of a Non-Federal Entity

Situation: An officer or employee of a non-Federal entity provides professional services to the same non-Federal entity and is paid with Federal awards for the services performed.

Requirement:

2 CFR 200.459 (a)

Costs of professional and consultant services rendered by persons who are members of a particular profession or possess a special skill, and **who are not** officers or employees of the non-Federal entity, are allowable.

Suggestion: The subrecipient must ensure through policies, procedures, and contract monitoring that their officers and employees are not allowed to perform professional services for the non-Federal entity that is also their employer.

Standards for Documentation of Personnel Expenses

Situation: The subrecipient does not maintain sufficient supporting documentation for salaries and wages charged to the grant. There is little or no account of the daily work performed, and hours charged to the grant are not recorded.

Requirements:

2 CFR 200.430 (i) (1) (i)-(vii)

Charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed. These records must:

- (i) Be supported by a system of internal control which provides reasonable assurance that the charges are accurate, allowable, and properly allocated;
- (ii) Be incorporated into the official records of the non-Federal entity;
- (iii) Reasonably reflect the total activity for which the employee is compensated by the non-Federal entity, not exceeding 100% of compensation activities...;
- (iv) Encompass both Federally assisted, and all other activities compensated by the non-Federal entity on an integrated basis, but may include the use of subsidiary records as defined in the non-Federal entity's written policy;
- (v) Comply with the established accounting policies and practices of the non-Federal entity...;
- (vii) Support the distribution of the employee's salary or wages among specific activities or cost objectives if the employee works on more than one Federal award; a Federal award and non-Federal award; an indirect cost activity and a direct cost activity; two or more indirect activities which are allocated using different allocation bases; or an unallowable activity and a direct or indirect cost activity.

(additional citations concerning standards for documentation are found at 2 CFR 200.430 (i) (1) (viii)-(x))

Suggestion: Supporting documentation for salaries and wages should include the name of grant-funded employee being compensated, reporting period dates, total hours worked per day with a breakdown of funding sources if there is more than one (including general funds and non-Federal grant activities), amount of time spent on an activity that totals the hours worked that day, and be signed by the grant-funded employee.

Subrecipient Monitoring and the Single Audit Requirement

Situation: Subrecipients who receive \$750,000 or more in total Federal awards per fiscal year have not had the required single or program specific audit performed. Additionally, subrecipients who are also pass-through entities have not verified that their subrecipients who

have \$750,000 or more in total Federal awards per fiscal year have had the required program specific or single audit performed.

Requirement:

2 CFR 200.501 (a)

Audit Requirement. A non-Federal entity that expends \$750,000 or more during the non-Federal entity's fiscal year in Federal awards must have a single or program-specific audit conducted for that year in accordance with the provisions of this part.

2 CFR 200.331 (f)

All pass-through entities must:

Verify that every subrecipient is audited as required by Subpart F—Audit Requirements of this part when it is expected that the subrecipient's Federal awards expended during the respective fiscal year equaled or exceeded the threshold set forth in 200.501 Audit requirements.

Suggestion: Subrecipients who expect to have more than \$750,000 in total Federal awards for a fiscal year must have a single audit performed. Additionally, subrecipients who are also pass-through entities must have a system in place to determine whether their subrecipients comply with 2 CFR 200.501 (a).

Subrecipient Policies and Procedures

In addition to Federal requirements, all policies and procedures issued by the subrecipient's organization must be followed. The Federal requirements are not intended to conflict with an organization's policies and procedures. If a conflict occurs, then the more restrictive policy should be followed.

Appendix I: Noncompetitive Procurement for HSGP Subrecipients

Noncompetitive procurement is addressed in 2 CFR 200.320 (f). As it pertains to the HSGP grants, MSP/EMHSD discourages all forms of noncompetitive procurement. Sealed bids or other methods of contract solicitation should be used even in situations where you believe only one vendor can supply the goods or services. You are encouraged to discuss the noncompetitive procurement situation with the appropriate MSP/EMHSD personnel **prior to** this type of procurement activity.

In situations where noncompetitive procurement may be allowed, justification documentation must be prepared, submitted with your reimbursement packet, and retained in the procurement file for each noncompetitive procurement, excluding micro-purchase procurement procedures as outlined at 2 CFR 200.320 (a).

If you are participating in noncompetitive procurement, you must prepare a justification document addressing all elements listed below. The justification document is required for each noncompetitive procurement and must be submitted as part of your reimbursement packet. The justification must:

1. Identify which noncompetitive procurement circumstance pertains to the purchase:
 - (1) The item is available only from a single source;
 - (2) After solicitation of a number of sources, competition is determined to be inadequate.
2. Describe the product or service being procured. Include the expected cost of the procurement.
3. For any noncompetitive procurement, explain why this procurement procedure is necessary. Include the following:
 - (1) How long will the noncompetitively procured contract be used for the defined scope of work?
 - (2) Include a statement of the impact on the scope of work if a noncompetitive contract is not used.
4. What steps did you take to determine that full-and-open competition cannot be used? Describe what research was completed/conducted to determine that there are limited qualified resources available to meet the contract provisions.
5. Describe any known conflicts of interest and what efforts were made to identify possible conflicts of interest before the noncompetitive procurement occurred. If no efforts were taken, explain why.
6. Include all other information justifying the use of noncompetitive procurement in this specific instance.
7. Remember a separate narrative must be prepared for each noncompetitive procurement.

Appendix J: Advance Request Procedures

If necessary, your organization may request an advance of grant funds by following the requirements below.

Advance Request Conditions

- Requests for advances must be for \$10,000 or more.
- The advance must be requested in a formal letter and include all documentation listed below together in an advance request packet.
- Advance funds must be placed in an interest-bearing account.
- Any interest earned over \$500 must be returned to MSP/EMHSD.
- All invoices and proof of payment must be dated and submitted to MSP/EMHSD within 90 days of receipt of the advance.
- All goods and services must be received within 60 days of receipt of the advance to ensure the 90-day advance liquidation deadline is met.

Advance Request Packet Required Documentation

- All advances must be requested in a formal letter. The letter must include the following:
 - Grant program title and grant year.
 - Dollar amount of advance request.
 - A line item budget including each item to be purchased with the advanced funds.
 - Certification that goods and services will be received within 60 days of receiving the advanced funds and proof of payment will be dated and submitted to MSP/EMHSD within 90 days of receipt of advance funds.
 - Advance request letters omitting any of the above criteria will not be considered.
- Approved purchase order(s).
- Vendor's quote/invoice.
- Signed and approved Alignment and Allowability Form (AAF).

Storage of Advance Funds

- Subrecipient must place advanced funds in an interest-bearing account.
- Subrecipient may keep interest earned up to \$500 per year to cover administrative expenses for all federal grant funds combined.
- Subrecipient must notify the MSP/EMHSD quarterly, in writing, of any interest earned over \$500.
- Subrecipients must send the MSP/EMHSD a check payable to the State of Michigan for any interest earned over \$500.
- Interest received by the MSP/EMHSD is returned to the federal government.

Advance Timeframe

Advances cannot be outstanding for longer than 90 days. All invoices and proof of payment must be dated within 90 days of the advanced payment issue date.

When advance purchases are completed, subrecipient must submit:

- Reimbursement cover sheet (EMD-054) and indicate it is advance documentation.
- Copy of supporting paid invoices.
- Copy of cancelled checks.
- Copy of approved alignment and allowability form (AAF).
- A check for unused portion of advance made payable to the State of Michigan.
- Details forms (if necessary)

Appendix K: Acronym List

AAF	Alignment and Allowability Form
AEL	Authorized Equipment List
BSIR	Biannual Strategy Implementation Report
CBRNE	Chemical, Biological, Radiological, Nuclear or Explosive
CFR	Code of Federal Regulations
CIKR	Critical Infrastructure and Key Resources
COC	Critical Operational Capabilities
CPG	Comprehensive Preparedness Guide
EHP	Environmental and Historic Preservation
EIN	Employer Identification Number
EMAC	Emergency Management Assistance Compact
EMAP	Emergency Management Accreditation Program
EOP	Emergency Operations Plan
GPD	Grant Program Directorate
HSGP	Homeland Security Grant Program
IB	Information Bulletin
IJ	Investment Justification
JTTF	Joint Terrorism Task Force
LETPA	Law Enforcement and Terrorism Prevention Activities
M&A	Management and Administration
MIOC	Michigan Intelligence Operations Center
NIMS	National Incident Management System
NOFO	Notice of Funding Opportunity
NPG	National Preparedness Goal
NPS	National Preparedness System
OPSG	Operations Stone Garden
POETE	Planning, Organization, Equipment, Training, and Exercises
PoP	Period of Performance
SAA	State Administrative Agency
SAR	Suspicious Activity Reporting
SHSP	State Homeland Security Program
SLTT	State, Local, Tribal, and Territorial
SPR	Stakeholder Preparedness Review
THIRA	Threat and Hazard Identification and Risk Assessment
UASI	Urban Areas Security Initiative

Appendix L: MSP/EMHSD Points-of-Contact

Subject Matter	POC	Phone	Email
Audit / Site Visit	Ms. Sherrie Loader	517-284-3656	LoaderS@michigan.gov
District Coordinator, Region 1	Lt. Jeffery Yonker	517-284-3843	YonkerJ@michigan.gov
District Coordinator, Region 2N	Lt. Timothy Ketvirtis	586-726-6709	KetvirtisT@michigan.gov
District Coordinator, Region 2S	Lt. Nathaniel McQueen	734-287-5044	McQueenN@michigan.gov
District Coordinator, Region 3, Midland Co. & North	Lt. Michael DeCastro	989-705-3805	DecastroM@michigan.gov
District Coordinator, Region 3, Bay Co. & South	Lt. Timothy Ketvirtis	586-726-6709	KetvirtisT@michigan.gov
District Coordinator, Region 5	Lt. Kenneth High	269-657-6081	HighK@michigan.gov
District Coordinator, Region 6	Lt. Orville Theaker	269-953-6099	TheakerO@michigan.gov
District Coordinator, Region 7	Lt. Michael DeCastro	989-705-3805	DecastroM@michigan.gov
District Coordinator, Region 8	Lt. Steven Derusha	906-227-7504	DerushaS1@michigan.gov
HSGP Program Analyst	Ms. Daniele Asbridge	517-284-3997	AsbridgeD@michigan.gov
HSGP Program Analyst	Ms. Alyssa Duhr-Vannelli	517-0248-3943	DuhrVannelliA@michigan.gov
HSGP Program Analyst	Mr. Michael Graff	517-284-3968	GraffM2@michigan.gov
HSGP Program Analyst	Mr. Paul Lounsberry	517-284-3655	LounsberryP@michigan.gov
HSGP Financial Analyst	Ms. Mikaela Lodes	517-284-3981	LodesM1@michigan.gov
HSGP Financial Analyst	Ms. Amanda VanKoeving	517-284-3978	VanKoevingA@michigan.gov
Financial Administration Unit Manager	Mr. Richard Sheaffer	517-284-3983	SheafferR@michigan.gov
Grants and Financial Management Section Manager	Ms. Penny Burger	517-284-3991	BurgerP@michigan.gov
Grants Unit Manager	Ms. Kim Richmond	517-284-3952	RichmondK@michigan.gov
NIMS Compliance	Mr. Henrik Hollaender	517-284-3970	HollaenderH@michigan.gov
Project Submittals	EMD_HSGP@michigan.gov	N/A	EMD_HSGP@michigan.gov
Training	Ms. Danica Frederick	517-284-3984	FrederickD3@michigan.gov
Exercise	Mr. Shawn Ewing	517-284-3993	EwingS2@michigan.gov